

Attachment – Industry Responses to NRC Comments on NEI 08-01, Revision 4 – Draft F (7/8/10)

<p>1. The definitions section would be an advantageous point to introduce the Complete ITAAC List for each applicant, derived from the design cert’s complete list. NRC has proposed this concept in our public workshops, and encourages NEI to add this to guidance.</p>	<p>Based on the discussion at the May 13 CIP Workshop, we have added the following sentence to Section 4.2 of NEI 08-01: “To facilitate planning, tracking and communication, the schedule information for ITAAC-related activities provided to the NRC should uniquely identify all ITAAC for the project, including design certification and plant-specific ITAAC.”</p>
<p>2. This section, and also App C of this guide, needs to reinforce the licensee’s adaptation of a graded QA approach for ITAAC completion on RTNSS and non-safety ITAAC. Please see NUREG 0800 section 17.5v for expectations on QA usage.</p>	<p>We have added this sentence to Section 3.1.2: “For example, licensees apply QAP requirements in a selected manner to non-safety-related SSCs and related activities that are significant contributors to plant safety.”</p>
<p>3. Remove (no sampling). Basis: The no sampling is redundant and could also be misleading. Specifically, we will inspect all Emergency Planning and Security ITAAC. However, we may not inspect all aspects of the ITAAC SSC. For example, a security ITAAC may state that security door mounting hardware meets a certain specification. If there are 200 doors in the plant the NRC will NOT inspect 200 doors, but rather a sampling of these doors (may be 20).</p>	<p>Done.</p>
<p>4. Revise entire section to reflect acceptance criteria “are met” language</p>	<p>This change made in one place in paragraph 3 of Section 3.2.1 where the context is the required finding that all ITAAC are met. Other uses of “have been met” reflect/quote the language of the current rule or associated SOC.</p>
<p>5. “Engineering Change” better reflects the thresholds and Staff’s intent.</p>	<p>We believe “design change” is the proper term. Many licensees use the term “engineering change” to encompass a broader range of changes processed through their design engineering organizations that do not affect technical or regulatory requirements.</p>
<p>6. There is also a license amendment criteria related to threshold 3 that could be described as follows: “A license amendment is required if (1) there is a new item, since the submittal of the closure letter, that is subject to an ITAAC, (2) the ITAAC requires that the ITA be performed on the new item, and (3) the licensee proposes not to perform the ITA on that new item and demonstrate that the AC is met for it.”</p>	<p>This scenario envisions that a licensee may propose to not perform a specified ITA on an SSC subject to ITAAC. We believe this scenario is adequately addressed in the first paragraph of Section 3.2.4 which identifies that Section 52.98(f) requires a LAR for any modification, addition to or deletion from ITAAC. (That paragraph goes on to say that an exemption is also necessary if the affected ITAAC is derived from a design certification.) As such, we have not added the suggested LAR criterion.</p>

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<p>7. As with the comment in the definitions section regarding Complete ITAAC Lists, language here could promote the use of a single, updated ITAAC list per applicant used as a master reference file. If not here in 3.2.4, maybe elsewhere in 3.2 or even Section 8. Revise paragraph:</p>	<p>See response to Comment 1.</p>
<p>8. If it grants a hearing request under Section 52.103, the Commission also will determine whether to allow interim operation during the hearing, on the basis that there will be reasonable assurance of adequate protection to the public health and safety notwithstanding the pending hearing. See Section 52.103(c). This provision, authorizing interim operation during resolution of contested hearing issues and issuance of NRC findings under Section 52.103(g), is based on Section 189.a.(1)(B)(iii) of the Atomic Energy Act of 1954, as amended.</p>	<p>Done.</p>
<p>9. Please revise to read, "If The NRC staff agrees with the representation in, informed by the licensee's "All ITAAC Complete" letter, has said it will make a recommendation to the Commission regarding the Section 52.103(g) finding that all ITAAC are met.</p>	<p>[Response to Comments 9,10,11]</p> <p>Section 3.4, paragraph 5, revised as follows: "<u>If the NRC staff agrees with the representation in the licensee's "All ITAAC Complete" letter, it will make a recommendation to the Commission regarding the Section 52.103(g) finding that all ITAAC are met. To facilitate this staff recommendation, the licensee needs to ensure that all ITAAC were verified by the staff to be met at one time, and second, that the staff has confidence that the ITAAC determination bases have been maintained and that the ITAAC continue to be met.</u>"</p>
<p>10. Needs to address that staff makes this verification.</p>	
<p>11. Paragraph 5 sounds like NEI is tell the NRC what to review. This should focus on what the licensee needs to do to ensure that All ITAAC Complete" letter is valid. "The licensee needs to ensure that staff will consider two criteria when making its recommendation: first, that all ITAAC were verified to be met at one time, and second, that the licensee staff has confidence that the ITAAC determination bases have been maintained and that the ITAAC continue to be met. These criteria will be considered to be met provided conditions do not exist that would cross one of the thresholds discussed in Section 8.1.2 requiring a Supplemental ITAAC Closure Letter. As indicated by these considerations, the state of SSCs being out-of-service does not necessarily invalidate prior ITAAC conclusions; ITAAC continue to be met and are being maintained. Thus, SSCs may be out-of service for maintenance or other</p>	

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<p>reason at the time of the Section 52.103(g) finding.”</p>	
<p>12. Revise sentences as follows: For the final finding under 10 CFR 2.340(j), the Commission or its delegate will make a finding within 10 days from the date of issuance of the initial decision, if the acceptance criteria not within the scope of the initial decision have been, or will be, met and notwithstanding the pendency of a petition for reconsideration or review, or motion for stay, or filing of a petition for action to modify, suspend, or revoke a license (assuming that the Commission is ready to make the necessary :“are met” findings for all other acceptance criteria). Provided the licensee has satisfied other applicable license conditions and technical specifications, issuance of the Commission’s determination that all acceptance criteria are met would allow t the licensee to begin operation/initial fuel loading.</p>	<p>Done. Instead of “issuance of the Commission’s determination that all acceptance criteria are met...”, the language in Section 3.4 (last paragraph) has been modified to read “issuance of the <i>required finding</i> that all acceptance criteria are met...”</p>
<p>13. Change to more general “notifications” because supplemental letters are contemplated with the changes.</p>	<p>Done.</p>
<p>14. Section also needs to address my comment from the 3/25 meeting on draft E version that an explanation should be included on how the justification is technically sound.</p>	<p>The last paragraph of Section 5.1.3 refers to Section 8.5.7 for discussion of Technical Justifications, including the need to describe why the justification is technically sound. No change to 5.1.3.</p>
<p>15. Should state “in accordance with 52.99 and the guidance.....” as discussed during our 3/25 workshop, slide 7. Here and next 2 subsections.</p>	<p>Done.</p>
<p>16. There are also exemptions but this points only to the license amendment provision. NEI could say “NRC review and approval as explained in Section X.X.” where Section X.X explains that an exemption is needed if ITAAC is from a certified design.</p>	<p>Agreed. 3d bullet in Section 8.1.1 modified to read: “Note: the license cannot alter the wording of an ITAAC without obtaining NRC review and approval <u>as discussed in Section 3.2.4.</u>” Section 3.2.4 identifies when an LAR and exemption are both needed.</p>
<p>17. See comment above</p>	<p>Done.</p>
<p>18. See comment above</p>	<p>Done.</p>

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<p>19. Licensees should promptly notify the NRC of any materially incomplete or inaccurate communications. The discussion here needs to reflect that.</p>	<p>Section 8.1.2, 3d paragraph, has been modified as follows: “Upon determining the need to withdraw or correct an ITAAC Closure Letter, the licensee should notify the NRC <u>within seven days. Licensees should use Appendix G to notify NRC of such conditions.</u>”</p> <p>Also added similar language regarding prompt notification of material alterations of ITAAC determination bases.</p>
<p>19.a NRC provided a supplemental comment via email on 6/18/10 that the 24 hour clock on prompt notifications after the “All ITAAC Complete” letter is submitted should start from when new information is identified, not after determining a notification threshold was crossed.</p>	<p>We expect that licensees will make prompt determinations regarding the need to notify NRC and have added the following sentence to the 4th paragraph of Section 8.1.3:</p> <p>“Licensees should evaluate new information or conditions expeditiously to determine if a notification threshold is exceeded.”</p> <p>As discussed in public meeting and in our April 29, 2010 letter, we do not agree that licensees should be required or expected to notify NRC of conditions until the licensee has determined that the conditions exceed one of the notification thresholds.</p> <p>Dong so is problematic as a matter of process and is unnecessary to assure the plant is ready to operate prior to fuel load.</p>
<p>20. This AC is so specific that this could be a bad example to use. Maybe if a system flow was stated, and not a specific flow thru an MOV, it could work better. Maybe if the acceptance criteria stated that the system is required to provide 300 gpm to the reactor vessel, and the licensee needed to calculate the flow through this valve, it could be OK because the acceptance criteria does not explicitly state 300 gpm through the MOV</p>	<p>Response to Comments 21-22</p> <p>The sentences suggested in Comment 21 were added to the Threshold 1 example in Section 8.1.2:</p> <p><u>This would be an acceptable means to meet the AC, after maintenance, if completion of construction activities no longer allows flow to be measured through this valve. However, post maintenance analysis should not be used for testing convenience.</u></p>
<p>21. Additional comments on how to change Threshold 1 - Example: The AC states that 300 gpm flow passes through an MOV. The MOV is replaced and water cannot be flowed through the valve as part of the PWV to verify the AC continues to be met. Instead, the valve is stroked and an engineering analysis is performed to validate the AC. <i>This would be an acceptable means to meet the AC, after maintenance, if completion of construction</i></p>	

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<p><i>activities no longer allows flow to be measured through this valve. However, post maintenance analysis should not be used for testing convenience. This condition requires a Supplemental ITAAC Closure Letter because an engineering analysis was created to verify that stroke timing of the replacement valve is sufficient to validate the same requirements as the original ITAAC testing.</i></p>	
<p>22. This example might better show the need for a supplemental closure letter if the correction was "material" to closure.</p>	<p>The Threshold 4 example in Section 8.1.2 was modified as follows: <u>If the addition or correction is material to the ITAAC Determination Basis, This condition requires a Supplemental ITAAC Closure Letter is required</u> to update the ITAAC determination basis to reflect the corrected or supplemented seismic report.</p>
<p>23. Delete "new" per 3/25 slides</p>	<p>Done.</p>
<p>24. Delete "identified to the NRC" per 3/25 slides</p>	<p>Done.</p>
<p>25. Additional comment from 3/25 requested to add that the PWV, if different, should be appropriate to the situation. Also on slide 9 from 3/25, comment to link "engineering justification" to 1st threshold's "significantly different approach", as used in App H. Section should be bolstered to support this.</p>	<p>Agreed. Last bullet of Section 8.1.2 modified as follows: "If PWV is <u>significantly different</u> from the original ITAAC, the ITAAC Closure Package should be supplemented with an engineering justification that <u>explains why the PWV is appropriate to the situation and provides the basis for the conclusion that ITAAC acceptance criteria continue to be met.</u>"</p>
<p>26. Please address if ITAAC maintenance will be tracked in the CAP</p>	<p>The last sentence of the 2nd paragraph of Section 8.1.3 has been modified as follows: "Components out of service for corrective maintenance, <u>including components associated with ITAAC,</u> will be tracked via <u>appropriate</u> corrective action processes.</p> <p>And the following sentence has been added to the last paragraph of Section 8.1.3: "As identified in NEI 08-02, conditions determined to be material to a conclusion in an ITAAC Closure Letter previously submitted to the NRC should be entered into the Corrective Action Program."</p>
<p>27. Also, please revise as follows: "Licensees may consider all ITAAC complete and submit its "All ITAAC Complete" letter to the NRC even if maintenance activities are in progress on ITAAC components provided the activities do not exceed the notification thresholds identified in Section 8.1.2. The state of being out-of-service pending restoration in accordance with licensee programs and procedures does not</p>	<p>Done.</p>

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<p>necessarily invalidate prior ITAAC conclusions; these ITAAC continue to be met. Components out of service for corrective maintenance will be tracked via construction corrective action processes."</p> <p>The struck out text is not consistent with the rest of the changes made to this paragraph, and needs to be deleted</p>	
<p>28. Remove "resident inspector" and just notify the NRC</p>	<p>Done.</p>
<p>29. This statement needs to be deleted or revised, as it attempts to change the definition of "as-built." "As-built" ALWAYS refers to the condition in the final, in-plant location. What the definition allows is reliance on ITAs at other locations for meeting the ITAAC.</p>	<p>Section 8.5 revised as follows: "For these ITAAC, the term "as-built" physical properties of the completed engineered component <u>may be determined via ITA performed in as it is shipped from the manufacturing facility.</u>"</p>
<p>30. Remove term "facility"</p>	<p>Done.</p>
<p>31. Remove term "generally"</p>	<p>Done.</p>
<p>32. New language seems to be more vague than the previous text</p>	<p>Because the staff comment expresses no specific concern, no change has been made.</p>
<p>33. The previous version stated that <u>it was assumed</u> such testing would be performed with the SSC installed in its final locations at the plant site. This current NEI change notes that it <u>should generally be performed</u> with the SSC installed in its final installed location. This language could allow the industry to do more testing prior to the SSC being in its final installed location, and works against staff's intent</p>	<p>Deleted "generally." See Comment 31.</p>
<p>34. Is NEI suggesting that they are adding ITAAC? ITAAC are added by license amendment/exemption. Please clarify.</p>	<p>Section 8.5.3 revised as follows: "When the<u>Certain</u> ITAAC use terminology indicating that the as-built construction should be bounded by ITA performed at other than the final installed location (e.g., Type Testing, such as seismic, harsh environment, or active safety component testing). then completion of sSuch ITAAC <u>may include a requirement to verify should include or be supplemented by other ITAAC requiring verification of the installed component configuration in its final location at the plant site, or this verification may be accomplished by a separate ITAAC.</u>"</p>

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<p>35. Should be understood that, if there is a question about an item that falls in this category, it will be the licensee’s responsibility to demonstrate that what they did was “standard industry practice.”</p>	<p>The following sentence was added to the ITAAC Closure Letter Template (App. D-1):</p> <p>“Licensees should ensure that IDB description of ITA performed on SSCs at other than the final installed location is consistent with the generic technical justifications provided in Sections 8.5.1-8.5.6.”</p>
<p>36. Sentence has grammar issues</p>	<p>Sentence revised</p>
<p>37. See comments to Section 3.1.2, applicable to this appendix.</p>	<p>See response to Comment 2. We determined that no change was needed to Appendix C.</p>
<p>38. This template needs to be updated to reflect current staff developments on the DRAP ITAAC</p>	<p>Appendix D-10 has been modified to reflect the current form of the AP1000 DRAP ITAAC</p>
<p>39. And the applicable generic technical justification should be referenced in the IDB.</p>	<p>The following sentence was added to the ITAAC Closure Letter Template (App. D-1):</p> <p>“Licensees should ensure that IDB description of ITA performed on SSCs at other than the final installed location is consistent with the generic technical justifications provided in Sections 8.5.1-8.5.6.”</p> <p>Reference to the specific NEI 08-01 subsection is not considered necessary. Licensees will ensure that the description of the ITA in the ITAAC Closure Letter correlates readily to one of the generic technical justifications provided in Sections 8.5.1-8.5.6. This, coupled with a general reference to NEI 08-01 in the Closure Letter is considered sufficient for the staff and members of the public to understand the basis for how the ITA was performed.</p>
<p>40. As noted in the TOC for this app, please update this template to correctly reflect the current changes to DRAP ITAAC.</p>	<p>See Comment #38</p>
<p>41. What is “significantly different”, and why is a supplemental letter is required? The examples should clarify why a supplemental is needed here to help future users of the document understand the principle underlying this example and to apply it to future situations.</p>	<p>The following sentence was added to Example 7 in Appendix H:</p> <p><u>“PWV consisting of a loop flow test supported by analysis differs significantly from the original test-only ITAAC methodology. A Supplemental ITAAC Closure letter is required.”</u></p>
<p>42. NSIR’s correction here was to delete personnel, and add “onsite workers”</p>	<p>As discussed on May 13, “onsite workers” would exclude visitors. We believe that “personnel” is the more inclusive, preferred term.</p>

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<p>43. In a separate e-mail on June 4, NRC suggested content for a prompt notification template to include in NEI 08-01</p>	<p>With minor edits and without reference to regulations that do not yet exist, we have included the NRC-proposed template guidance in Appendix G of NEI 08-01.</p>
<p>NSIR Comments – Dispositioning of NSIR Comments is identified separately. As a general matter, we did not consider it necessary to define or include the concept of EP Program Elements. Instead we revised the document so focus is not unduly limited to SSCs. For example, Section 3.1.4, last paragraph, was modified as follows: "After an ITAAC Closure Letter is submitted, events may occur that adversely affect the validity of the ITAAC conclusions described in the letter. The process for determining whether such issues require submittal to NRC of a supplemental ITAAC Closure Letter is discussed in Section 8.1 of this document." Other NSIR comments were accepted, as appropriate, as indicated in the attached mark-up.</p>	

Proposed NSIR/DPR/EP group changes to:
Nuclear Energy Institute (NEI) 08-01, Industry Guideline for the ITAAC Closure Process
Under 10 CFR Part 52, (Revision 4 DRAFT E)

Black text – current unrevised text

Blue text – currently NEI proposed (3-17-10, rev 4E), revised text

Red text – NSIR/EP group proposed revisions

Pg. 2 (top of page)

Chapter 1.0, "Introduction", Section 1.1, Purpose and Scope, para. #1

Did not incorporate this comment. It is too specific and is not necessary.

NRC regulations implement the AEA's provisions. In particular, the Commission findings that must be made in connection with the issuance of a COL are set forth in 10 CFR 52.97. The Commission will identify within the COL the inspections, tests and analyses, **including those applicable to emergency planning**, that the licensee shall perform, and the acceptance criteria that, if met, "are necessary and sufficient to provide reasonable assurance that the facility has been constructed and will be operated in conformity with" the license, the AEA, and NRC regulations. **See 10 CFR 52.97(b)**. The licensee verifies that the plant has been built according to the COL, the Atomic Energy Act and the Commission's regulations by performing ITAAC that are part of the COL.

Incorporated

Pg(s). 3-4 (bottom to top of page)

Chapter 2.0, "Definitions"

Inspect or inspection means visual observations, physical examinations, or review of records based on visual observation or physical examination that compare the SSC condition to one or more design commitments. **Inspect or inspection also includes the review of program elements, for compliance with ITAAC acceptance criteria.** Examples include walkdowns, configuration checks, measurements of dimensions, or non-destructive examinations (NDEs) or provisions for program elements.

Incorporated, but worded differently

Add definition for Program Element

Did not incorporate because this term was not used in the document.

Program element refers to the means that exist to implement emergency items (e.g., procedures, facilities, equipment, or training) of the licensee.

Add definition for SSC

Structures, systems and components (SSC) refers to both safety-related and non-safety-related SSCs.

Did not incorporate. SSC is defined in Section 9.0. Also, 3.1.2, 5th paragraph states: ITAAC encompass SSCs of varying safety significance and safety classification, including safety-related and non-safety-related SSCs.

Pg. 6 (bottom to top of page)

Section 3.0, "General Description of 10 CFR Part 52 and ITAAC Processes," Section 3.1, "Role of ITAAC in Part 52 Process:" para. #3 -

Licensee programs (including but not limited to the technical specifications, the in-service inspection and in-service testing program, the quality assurance program, ~~the physical security and emergency preparedness/planning program~~ and the maintenance program), as well as the Commission's continuing regulatory oversight, continue to assure that the facility is operated in accordance with the license and NRC regulations. ~~It should be noted that elements of emergency preparedness/planning consist of facilities/equipment, programs, personnel and training. The majority of emergency preparedness/planning requirements are programmatic in nature and supplement the licensee's safety-related SSC physical facilities/equipment.~~

Not Incorporated - list is not intended to be all inclusive.

Pg(s). 8 - 9 (bottom to top of page)

Did not incorporate. This comment seems unnecessary and didn't make sense in the context of this paragraph.

Section 3.1.3, "Sampling Based Construction Inspection Program," para. #1 -

Incorporated, but worded differently

While the scope of NRC's Construction Inspection Program (CIP) is comprehensive, the NRC program does not, ~~typically~~, inspect 100% of ITAAC related activities. Consistent with historical practice, NRC will employ a sampling based inspection program, ~~for selected~~ ITAAC. For plants licensed under Part 52, the sampling based inspection targets to be included in the NRC's baseline inspection program will be selected based on a process that identifies those ITAAC having a higher inspection value. ~~However, the NRC has determined that all physical security and EP ITAAC will be inspected, as described in SECY-08-0117. This decision was based on the relatively small number of physical security and EP ITAAC, the qualitative nature of the Security and EP ITAAC and their high relative importance.~~ For subsequent construction projects, the NRC's baseline inspection scope may be further adjusted, based on prior inspection experience. For more information about the NRC's Sampling based CIP for new plants. See SECY-070047, ~~SECY-08-0117~~, and Inspection Manual Chapter-2503, Construction Inspection Program: Inspections of Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC).

Did not incorporate.

Incorporated.

Did not incorporate.

Incorporated, but worded differently and addressed in the third paragraph.

Pg. 10 (bottom of page)

Section 3.1.4, "ITAAC Performance by Licensees and Verification by NRC," para. #8 -

If the NRC determines after an ITAAC closure letter has been submitted that an ITAAC was, in fact, not met, the licensee would be subject to an ITAAC Finding. In determining the severity level of an ITAAC finding, the NRC should weigh the circumstances that led to the submittal of information later found to be incorrect. After the ITAAC letter is submitted, events may occur that adversely affect a SSC or program element(s), which was the subject of a previously closed ITAAC. The process for tracking and correcting these issues to restore the SSC or program element, is discussed in Section 8.1 of this document.

Addressed this comment, but in a different, more generic way.

Section 8.1, "Maintaining the validity of ITAAC conclusions post ITAAC completion," para #3 -

The licensee will complete ITAAC over a prolonged period. ITAAC closure letters will be submitted by the licensee to establish closure in accordance with 10 CFR 52.99(c)(1), as discussed in SECY-06-0114, *Description of the Construction Inspection Program for Plants Licensed Under 10 CFR Part 52*, May 13, 2006. Following licensee submittal of an ITAAC closure letter, significant time may elapse before the finding is made that all the ITAAC acceptance criteria are met in accordance with 10 CFR 52.103(g).

Incorporated.

Until the time all ITAAC are met and the Commission makes its 10 CFR 52.103(g) ITAAC finding licensees will use established programs (e.g., quality assurance, problem identification and resolution, design/configuration control, and construction/maintenance programs) to maintain the validity of prior ITAAC conclusions. This is known as ITAAC maintenance or maintaining ITAAC. The licensee should ensure that the following activities do not invalidate the ITAAC determinations:

Did not incorporate - adequately addressed in change to second bullet.

1 Normal maintenance and repairs on SSCs or of program elements, associated with ITAAC.

Incorporated.

2 Incidents or findings (e.g., damage from other nearby construction work, or a licensee's failure to maintain training qualifications of emergency response organization (ERO) plant personnel) which that create or identify potential non-compliances or non-conformances with SSCs or program elements, which that may be corrected under the licensee's Corrective Action Processes.

Addressed in a different way.

3 Changes to SSCs, or program elements, associated with ITAAC that may be permitted to be made by the licensee without prior NRC approval in accordance with applicable change control requirements.

Did not incorporate - unnecessary specificity.

While it is incumbent upon the licensee to maintain the validity of ITAAC conclusions as described above, the licensee should notify the NRC of the occurrence of certain post-ITAAC closure activities to affirm that the basis for determining that the ITAAC are met

In addition to notifications described below, routine interactions such as daily meetings would facilitate the communication with NRC Resident Inspectors regarding activities affecting closed ITAAC.

The licensee should notify the NRC resident inspector of:

- Corrective maintenance on SSCs or program elements related to closed ITAAC
- Submittal of a Supplemental ITAAC Closure Letter
- Submittal of a ITAAC Component Replacement Summary Letter

Did not incorporate - section was revised.

Pg. 28 (bottom of page)

Did not incorporate. Program elements don't seem to fit in the context of maintenance.

Section 8.1.1, "Attributes of Licensee Programs for Maintaining ITAAC." para.# 6

Each of these programs is subject to NRC inspection, and the NRC staff may assess the licensee's maintenance of ITAAC conclusions as one element of these inspections. NRC inspectors may also assess the licensee's maintenance of ITAAC conclusions as part of inspections under IP-XXXXX, Licensee Program for ITAAC Closure. Provided licensee programs restore SSCs or program elements to their ITAAC compliant condition following maintenance, prior ITAAC conclusions remain valid. Licensees will use these same or similar programs to maintain plant SSCs or program elements for the life of the plant after the 10 CFR 52.103(g) ITAAC finding is made.

Pg. 29 (bottom of page)

Section 8.1.2, "Post-ITAAC Closure Notifications to NRC Under 10 CFR 52.99(TDB)," last para.

If a condition is identified near the time of the expected 52.103(g) finding (e.g., after submittal of the ITAAC All Complete Letter), the NRC staff may proceed with the Section 52.103(g) finding recommendation to the Commission on condition that the affected SSCs or program elements must be restored and verified to their ITAAC compliant condition before the Commission makes the Section 52.103(g) finding that all ITAAC are met, and provided the following conditions are...

Did not incorporate - section was revised.

Pg. 30 (top of page)

Section 8.1.2, "Post-ITAAC Closure Notifications to NRC Under 10 CFR 52.99(TDB)," para. # 1

met: 1) the ITAAC was verified to be met at one time, and 2) the staff has reviewed and found acceptable the licensee's corrective action plan, including any engineering justification necessary for post work verification that significantly differs from the original ITAAC, and 3) the staff has confidence that all other ITAAC determination bases have been maintained and that the ITAAC continue to be met. Such a conditioned recommendation to the Commission allows the Section 52.103(g) finding process to proceed in parallel with maintenance to restore SSCs or program elements while assuring that all ITAAC are met prior to the Commission finding.

Did not incorporate - section was revised.