

Role of Enforcement, Assessment and Allegations on ITAAC Closure and Verification

kickoff meeting

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Background Information

- The important aspect of enforcement actions, allegations and the assessment of construction as it relates to ITAAC closure is to ensure licensees are effectively meeting the ITAAC acceptance criteria.
- The demonstration should exercise several scenarios that result in the acceptance criteria of an ITAAC not being met and show how the NRC/License will disposition these findings.
- NRC is refining enforcement/assessment actions that could impact the closure of an ITAAC.

Proposed Examples (DRAFT)

- Enforcement:
 - ITAAC 2.1.02.07a.i – NRC is reviewing an ITAAC closure letter and realizes that the type test performed by the vendor on an ADS valve used the wrong radiation and temperature parameters resulting in an **ITAAC finding**.
 - ITAAC 2.2.02.01 – NRC inspector identifies a manual valve on the drawing that was not installed. Further inquiry demonstrates that the related procedure was written only for the automatic valves, resulting in the manual valve installation not been verified :

Proposed Examples (DRAFT)

- Scenario A: An NRC identified finding that occurs before submittal of closure letter but the information collected by the NRC inspector showed QC would not have identified the omission. This results in **ITAAC related finding**.
- Scenario B: ITAAC closure letter was submitted late in the process and the NRC has not completed inspecting the ITAAC. NRC identifies the omission through the inspection . This results in **ITAAC finding**.

Proposed Examples (DRAFT)

- ITAAC 2.6.03.08 – Analysis did not adequately account for the collapse of the inductive motor on fault current but licensee review of the analysis was approved in the report. Licensee has not submitted the closure letter. NRC document review identifies this inadequacy which results in an **ITAAC related finding**.



Proposed Examples (DRAFT)

- Construction Finding: non compliances identified with the testing/analysis of ITAAC 2.6.03.08 (electrical analyses) have been surfacing in other work activities resulting in the identification of inadequate corrective actions and poor analysis of extent of condition. This finding could result in a possible apparent violation.



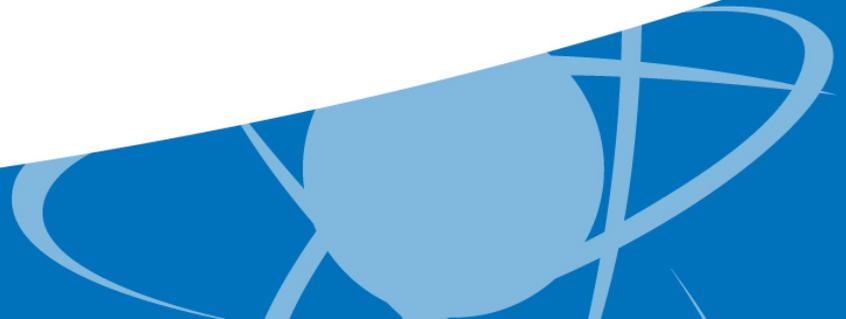
Proposed Examples (DRAFT)

- Allegation:
 - ITAAC 2.2.03.08c.i – NRC did not witness this test but based on the review of the report submitted by the licensee, NRC accepted the closure of this ITAAC. An allegation comes in stating that the test was performed out of sequence and that doing it out of sequence had a direct impact on the ITAAC. **If substantiated, closed ITAAC will be re-opened.**



ITAAC Closure Demonstration

- Assessment:
 - The NRC will evaluate the exercised examples and apply the current assessment process to determine the effectiveness of licensee's construction activities.



ITAAC Closure Demonstration

- If NRC determines that the inspection results show the licensee has met the ITAAC acceptance criteria, then it would be expected that:
 - Increase inspection sample (i.e. within family)
 - Letters to licensee communicating ITAAC closure was not accepted
 - Re-open closed ITAAC
 - Allow licensee to demonstrate how the ITAAC acceptance criteria was not affected by these findings (e.g. Construction Finding)



QUESTIONS?

