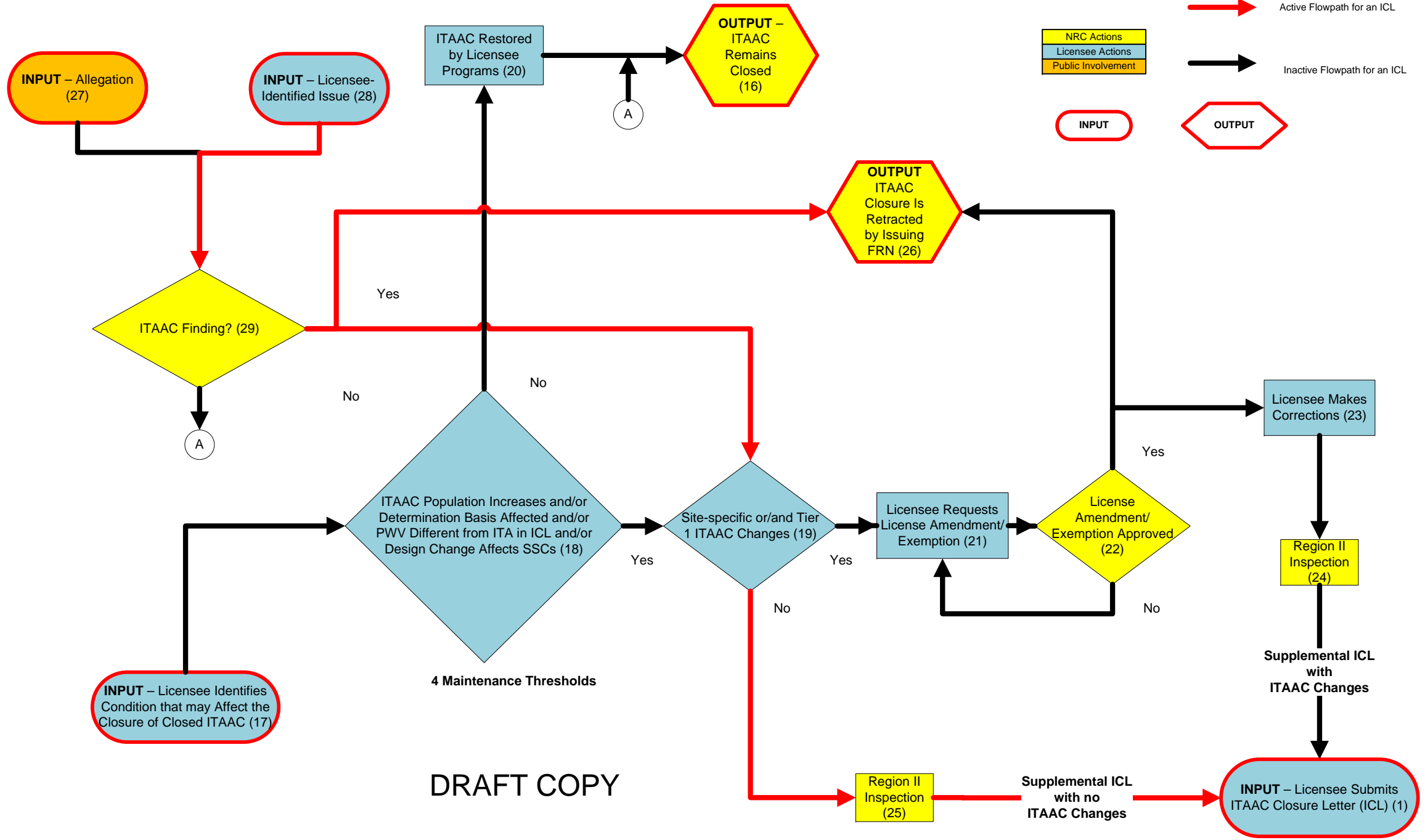
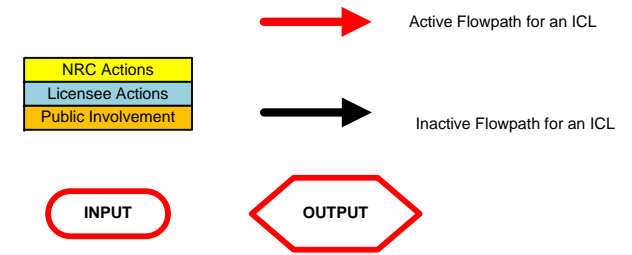


# ITAAC CLOSURE VERIFICATION PROCESS FLOWCHART (ALTERNATE FLOWPATHS FOR AN ITAAC CLOSURE LETTER (ICL)) SCENARIO 6

## LEGEND



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DESCRIPTION OF ITAAC CLOSURE VERIFICATION PROCESS (Abnormal Flowpaths for an ITAAC Closure Letter (ICL))

- (1) Licensee may submit to the NRC a supplemental ICL.
- (16) ITAAC remains closed because licensee through its programs restores ITAAC affected by exceeding a maintenance threshold to compliant condition (19). ITAAC also remains closed if there is a “no” at (28).
- (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 has been exceeded due to one or more of the following:
  - (a) population of SSCs identified in that ITAAC has increased and/or
  - (b) the determination basis of the ICL for that ITAAC warrants augmentation do to licensee activities, and/or
  - (c) post-work verification, different from the original ITA for that ITAAC, is performed which requires an engineering justification to validate that the original AC is still met and/or
  - (d) an engineering change affects acceptability of SSCs associated with a specific ITAAC.
- (19) If (18) or (29) is “yes”, then the licensee evaluates if changes are required to Tier 1 or site-specific ITAAC.
- (20) If (18) or (29) is “no”, then licensee programs, like PI&R, configuration management, etc, restore ITAAC to compliant condition, and ITAAC remains closed (15), or it was determined that there really was not an ITAAC finding against the ITAAC.
- (21) If (19) 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. If not approved, then the licensee will change the license amendment and resubmits to the NRC. The license amendment(s) should address the initial ITAAC and also any other ITAAC in same ITAAC family affected by the ITAAC finding or exceeding a maintenance threshold. The determination will have to made for those other ITAAC if ITAAC changes are also required for them. The DCIP PM shall status the individual and other ITAAC, which is/are contained in license amendment(s), as being “reopened” in EPM or if the ITAAC are open as not being able to be closed when license amendment(s)/exemption(s) is/ are approved.
- (23) Licensee receives a letter from NRC about the license amendment/exemption 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 licensee must address the corrective actions for all the affected ITAAC in the same ITAAC family when the license amendment(s)/exemption(s) are approved.
- (24) Region II performs additional inspections, as required, after informal notice from licensee to verify the licensee corrections identified in Item (23) above. Region II will determine the best time to perform the additional inspections, if necessary, whether before or after the licensee makes any additional changes and submits supplemental ICL(s) to the NRC because of the ITAAC changes identified for the individual and other ITAAC in same ITAAC family..
- (25) If (19) 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 exceeded or an ITAAC finding occurred with no ITAAC changes. Region II will determine the best time to perform the additional inspections, if necessary, whether before or after the licensee makes any additional changes and submits a supplemental ICL with no ITAAC changes to the NRC.
- (26) If (22) or (29) is “yes”, then an FRN is published to revoke the closure of the ITAAC previously closed. FRN(s) will also be required for other affected ITAAC in same ITAAC family as initial ITAAC being reopened. Any FRN(s) required for (22) will be for exceeding a maintenance threshold for which there are ITAAC changes, and any FRN(s) for (29) will be for an ITAAC finding against an ITAAC with or without ITAAC changes since ITAAC closure is always affected for an ITAAC finding.
- (27) An allegation against a previously closed ITAAC may cause an ITAAC finding at (29)
- (28) A licensee-identified issue against a previously closed ITAAC may cause an ITAAC finding at (29)
- (29) An evaluation is made to determine if there is an ITAAC finding due to either an allegation (27) or a licensee-identified issue at (28) against an original ITAAC. DCIP assessment branch, other NRO divisions, and Region II will determine if there should be an ITAAC finding against the original ITAAC. If (29) is “yes”, an evaluation is made at (18) to determine if there are ITAAC changes related with the ITAAC finding, and an evaluation will also be made to determine if other ITAAC in same ITAAC family as original ITAAC are also affected by the ITAAC finding. If (29) is “no”, ITAAC remains closed at (16), and an FRN is issued to retract closure of a previously closed ITAAC AT (26).