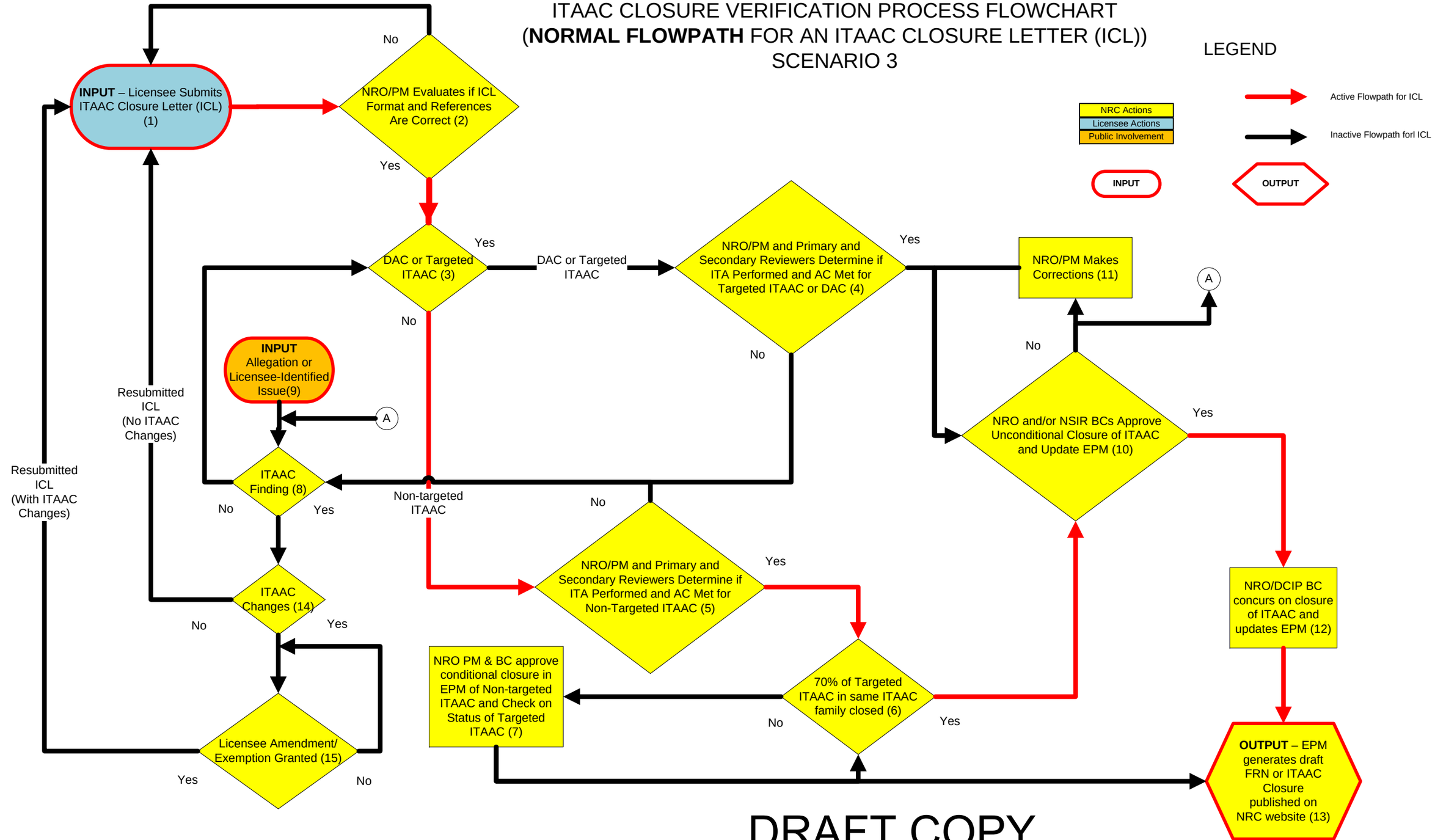
ITAAC CLOSURE VERIFICATION PROCESS FLOWCHART
(**NORMAL FLOWPATH** FOR AN ITAAC CLOSURE LETTER (ICL))
SCENARIO 3



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DESCRIPTION OF ITAAC CLOSURE VERIFICATION PROCESS (Normal Flowpath for an ICL)

(1) Licensee may submit to NRC an initial or resubmitted ICL.

(2) NRO PM determines if ICL has correct format and references based on examples of ICLs developed by the NRC and industry. If (2) is "no", either the format or/and the references of an ICL is/are not correct. The NRO PM should also verify that all ITAAC-related construction findings are closed. NRC informs the licensee by a letter of the rejection of the ICL. Licensee corrects the ICL for errors in the format or/and the references that only affect the acceptance of the ICL. If (2) is "yes", both the format and the references of an ICL are correct. The NRO PM acknowledges that 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 the 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, may be assigned to this review by their respective NRO and/or NSIR branch chiefs and will and provide input to the decision made by the NRO PM on the closure of an 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 (if assigned) approve(s) the DAC or targeted ITAAC as being ready for closure and manually indicate(s) that in EPM by electronic signature(s).

(5) If (3) is 'no', NRO PM determines for this non-targeted ITAAC if its ITA was performed and its AC met based on sufficient information and the licensee certifications in the ICL. The NRO PM and primary and secondary reviewers (if assigned) will again assist in the review of the closure of the ITAAC. The review will be similar to that for the DAC and targeted ITAAC, except there may be no inspection records in CIPIMS to confirm the closure of a non-targeted ITAAC.

(6) If (5) is "yes", NRO PM will determine if 70% of the targeted ITAAC in 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 the designated NRO BC. The conditional closure can be revoked by inspection, allegations, maintenance, or design issues that arise against ITAAC in same ITAAC family as the non-targeted ITAAC. If non-targeted ITAAC is conditionally closed, then NRO PM manually checks periodically on whether the majority of targeted ITAAC in same ITAAC family have been closed based on information in EPM concerning the status of 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), (5), or/and (10) is/are "no" or if there is an allegation or licensee-identified 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 branch, applicable NRO divisions, and Region II 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 to be reopened. For an ITAAC finding, other ITAAC in same ITAAC family will be evaluated to determine if they should not be closed or should be reopened. (8) is no, ITAAC re-enters ITAAC review process at (3).

(9) Allegation or license-identified issue against a previously closed or open ITAAC is received and reviewed by DCIP, Region II, and applicable NRO divisions. Allegation or licensee-identified issue may result in an ITAAC finding at (8) which will prevent the closure of an ITAAC and can cause an ITAAC to be reopened.

(10) If (4) or (6) is "yes", the respective NRO and/or NSIR branch chiefs of the NRO PM and primary and secondary reviewers determine if the DAC or ITAAC can be unconditionally closed. If the branch chiefs agree to close the DAC or ITAAC, they will indicate their decision in EPM.

(11) If 10) is "no", the NRO and/or NSIR BCs have made comments which have to be corrected before the ITAAC can be approved for closure. An NRO PM will make the changes, and they will be reviewed by an assigned NRO BC for concurrence. If NRO and/or NSIR BCs require some action by the licensee, the NRO PM will initiate contact with the licensee based on direction by DCIP/BC. In addition, a "no" at (10) may initiate an ITAAC finding at (8).

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

(13) EPM generates a draft FRN when DCIP/BC concurs on closure of the ITAAC or for conditional closure of a non-targeted ITAAC publishes it on an NRC website. The draft FRN is sent to appropriate NRC group for issuance. The FRN may announce the closure of one or several ITAAC.

(14) NRO staff determines if the ITAAC finding requires actual changes to the Tier 1 or site-specific ITAAC. If (14) is "no", the licensee re-submits the ICL to the NRC after licensee makes the necessary corrections for the ITAAC finding and Region II performs any required inspections.

(15) If 14 is "yes", the licensee submits a license amendment/exception to the NRC. If (15) is "no", the license amendment/exemption is not granted, and the licensee makes corrections to license amendment/ exemption and resubmits to NRC for review. If (15) is "yes", the licensee re-submits the ICL with identified ITAAC changes to the NRC