
Simulated ITAAC Closure and Verification Demonstration Project Lessons Learned March 31, 2011



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Simulated ITAAC Closure and
Verification Demonstration



Agenda

- Lessons Learned
 - Southern Nuclear (Paulo Albuquerque)
 - Inspection Support
 - Closure Letter
 - Westinghouse (Brian Bedford)
 - ITAAC Surge Investigation
 - ITAAC Surge Mitigation

Inspection Support Lessons Learned

- Inspection Planning is critical to both the Licensee and NRC

Prior to NRC Inspection

- Provide ITAAC Plan
 - ***Develop and make plan available***
- Provide Technical Documentation
 - ***Include Proprietary Information***
 - ***Develop a method for sharing this information with both NRC Region II and Headquarters***

During the Inspection

- Coordinate with Region II the need for making technical information available to headquarters to support a Region II inspection

Inspection Support Lessons Learned

- Existing PI&R systems are sufficient for ITAAC-related activities, but technology could be optimized for more efficient tracking and reporting.

Closure Letters Lessons Learned

- ITAAC Closure Letters must list Principal Completion Documents as references (available for inspection).
- The Closure Letter Determination Basis must ultimately provide enough detail for a knowledgeable person to conclude the ITA was performed and the Acceptance Criteria met.
 - Stating that an ITA was performed and referencing the results is not sufficient. The ITA methodology must be described at a conceptual level. Ensure that ITA information is clearly described in the determination bases.

Closure Letters Lessons Learned

- NEI 08-01 Appendix D provides guidance on Closure Letter preparation
 - The D-1 Template and D-x examples guide the format, content, and level of detail
 - The letter content must be confirmed by the actual ITAAC wording and DCD definitions, and the “sufficient information for a knowledgeable person” standard.
- Partial ITAAC closure may be useful in some situations, but presents administrative challenges requiring special attention.

ITAAC Surge Investigation Lessons Learned

- The ITAAC Completion Surge that occurs late in the project is significant, and requires special attention.
- Overall, the ITAAC Surge is based on the construction sequence, and cannot be significantly reduced.
- Detailed Analysis of the ITAAC surge will yield minor schedule improvements. Categorizing ITAAC by type is most productive.

ITAAC Surge Mitigation Lessons Learned

- Although the Surge in ITAAC Completion cannot be significantly reduced, its impact can be mitigated
 - Many of the ITAAC very late in construction are:
 - Reference ITAAC, which should not require significant effort to complete or review
 - The Pre-Operational tests, which have a well understood process and a high level of NRC Inspector involvement.
 - Early planning and documentation of ITAAC can flatten the “manpower curve” for completing the ITAAC.
 - Continual Interaction on ITAAC Closure is imperative up-to and through the ITAAC Surge
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Questions/Comments

