

# Simulated ITAAC Closure and Verification Demonstration

Draft ITAAC Closure Verification *Federal Register* Notice

Draft Staff Determination of Completion of ITAAC Checklist

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## FRN Template

- NRC staff developed a draft ITAAC closure *Federal Register* Notice (FRN) template to document the successful completion of ITAAC
- OGC provided initial feedback
- Template was completed for the two ICLs that were verified during the demonstration
- Completed templates were submitted to the Office of Administration (ADM) for review



## FRN Template

- The FRNs were published in ADAMS
  - ML110280372
  - ML110280358
- ADM provided some editorial changes to the draft template and proposed timeline for publication
  - FRNs will be published in the Daily *Federal Register* approximately 7 days after receipt by ADM
- Additional FRN templates maybe needed, such as for the 225-day notification

3

## Determination Basis Checklist

- The staff drafted a checklist to aid in the closure verification of ITAAC
- The checklist standardizes the approach to review ITAAC completion letter (ICL), ITAAC determination basis (IDB), and supporting information on ITAAC completion
- The checklist will be completed and signed by the reviewing project manager
- The checklist is **NOT** intended to be the sole documentation supporting the Commission's finding

4

4

**Staff Determination of Completion of  
Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC)**

**Docket #** [NRC-2011-0XXX]

**Company ABC**

**Combined License (#XXXXXX)**

**ITAAC Submittal Number #** (reference ADAMS ML#####)

**ITAAC #** \_\_\_\_\_ **Targeted** \_\_\_\_\_ **Non-Targeted** \_\_\_\_\_

**ITAAC Family Designation** \_\_\_\_\_

**Name of NRC NRO Project Manager (PM)** \_\_\_\_\_

**Review of the ITAAC Completion Letter (ICL), ITAAC Determination Bases (IDB), and Supporting Information on ITAAC Completion Submitted Under 10 CFR 52.99(c)(1)**

NRO PM – check to verify that the ICL, and its IDB summary, demonstrate that the licensee has successfully completed the ITAAC (enter “Yes” or “No” on the blank beside the relevant item):

- \_\_\_ The ICL clearly identifies the licensee, the site and unit number, and the docket.
- \_\_\_ The ICL clearly identifies the ITAAC whose closure the ICL is documenting, and restates the relevant ITAAC. The restated ITAAC is identical to the version of the ITAAC in the combined license.
- \_\_\_ There are references to standards (for example ASME) or records (tests, reports, completed procedures, completed analyses, etc.) when they are utilized to perform the inspections, tests and analyses (ITA) or demonstrate that the acceptance criteria (AC) are met.
- \_\_\_ The ICL affirms that the ITAAC is complete and provides a signature affirmation from an appropriate licensee representative.
- \_\_\_ The IDB adequately summarizes the methodology for performing the inspection, test, or analysis stated in the ITAAC.
- \_\_\_ Was an inspection, test, or analysis (ITA) for an as-built ITAAC performed on an SSC at other than the SSC’s final installed location? If no, skip this section.
  - \_\_\_ Is the licensee’s performance of the ITA at other than the final installed location consistent with the definition of “as-built” that applies to the ITAAC? (For a licensee using the NEI 08-01 definition of “as-built,” the licensee can rely upon the generic technical justifications in Section 8.5 of NEI 08-01 if they apply).
  - \_\_\_ Does the IDB adequately summarize any required justification for ITA performance at other than the final installed location? (For a licensee using the NEI 08-01 definition of “as-built,” a summary could include an appropriately described reference to the generic technical justifications in Section 8.5 of NEI 08-01).

Use the comments section below to further describe any issues related to as-built ITA.

The IDB contains sufficient information to enable a reasonable person familiar with technical and engineering concepts to understand the bases underlying the licensee's representation that the inspections, tests, and analyses have been successfully completed and the acceptance criteria have been met.

All planned NRC inspections related to the ITAAC have been completed and relevant ITAAC-related construction findings and relevant ITAAC findings are confirmed closed by utilizing CIPIMS.

After review of the ITAAC completion letter and applicable NRC inspection reports, staff has determined that the inspections, tests, and analyses prescribed for this ITAAC have been successfully completed, and that the acceptance criteria have been met.

This is considered a qualified determination of successful completion dependent on the licensee's ability to maintain the condition that the acceptance criteria are met. This qualified determination will be used to support a recommendation to the Commission that it can find pursuant to 10 CFR 52.103(g) that all acceptance criteria in the combined license are met. The ITAAC closure process is not finally concluded until the Commission makes an affirmative finding under 10 CFR 52.103(g).

**Additional Comments** (if needed) including, but not limited to:

- (1) explanation of material differences between the ICL and associated inspection reports,
- (2) an identification of ICL statements relevant to ITAAC closure with which the NRC staff disagrees and an explanation of the significance of this disagreement for ITAAC closure,
- (3) comments related to “as-built” inspections performed at other than final installed locations,
- (4) an explanation of the bases for determining that an ITAAC has been successfully completed to the extent that the NRC staff bases differ from the bases presented in the ICL,
- (5) an explanation of the bases for rejecting an ICL (if the ICL is deemed to be materially deficient), and
- (6) a listing of licensee’s onsite ITAAC completion documentation reviewed in support of this determination.

Blank lined paper with a large, faint, light gray watermark reading "DRAFT" diagonally across the top left corner.

**NRC NRO PM Signature**

Date \_\_\_\_\_