

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

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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

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**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.

