

# Regulatory Guide 1.215

## Revision 1 Update



# Schedule

- SRM on proposed ITAAC maintenance rule specifies “The staff should release Regulatory Guide 1.215, Revision 1 (proposed) at the same time or before the proposed rule is published in the *Federal Register*.”
- “The staff should provide the Commission with a revised proposed rule for information 30 days before it is delivered to the *Federal Register* for publication.”
- Goal is to publish both proposed rule and draft RG simultaneously by the end of April

# Draft Revision 1 Edits

- Updated to stay current with NEI 08-01 Revision 4
- Changes center around ITAAC maintenance proposed rule items
  - Proposed 52.99(c)(2) Post-closure notifications
  - 225-day uncomplete ITAAC notifications have been moved to 52.99(c)(3)
  - Proposed 52.99(c)(4) All ITAAC complete notification
- Early notifications to the NRC regarding 52.99(c)(2) and 52.99(c)(4) have been removed from the proposed rule, but remain in NEI 08-01 and RG 1.215

# Discussion on Sections

- Terminology –
  - 52.99(c)(1) ITAAC closure notification
  - 52.99(c)(2) ITAAC Post-closure notification
  - 52.99(c)(3) Uncomplete ITAAC notification
  - 52.99(c)(4) All ITAAC complete notification
- References to licensee's “Problem Identification & Resolution Program” changed to “Corrective Action Process”
- Definition of “as-built” discussion on Section 2
- Discussion on Section 4 adds Level 3 schedule submittals and maintaining complete ITAAC lists

# Discussion on Sections

## ● Section 6

- Public and non-public versions for proprietary information necessary in notifications
- Partial closure notifications proposed

## ● Section 8

- ITAAC maintenance thresholds and examples
- Timing of early notifications to the NRC
- As-built ITA at other than final installed locations
- Use of “standard industry practice”

# Discussion on Appendices

- Graded QA approach discussion in Appendix C
- Additional guidance to level of detail in IDB for Appendix D examples
- Short discussion for each appendix added to 08-01