

Simulated ITAAC Closure and Verification Demonstration

Lessons Learned

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Overview

- Communication
- IT Infrastructure (CIPIMS, VOICES)
- Inspections
- ITAAC Closure Verification
- ITAAC Completion Packages
- Next Steps (Brainstorming)

Communication

- Refine Technical Assistance Request (TAR) process to accommodate two way communication between HQ and Region II for scheduled and emergent inspections
- Develop mechanism to communicate non-acceptance of ITAAC Completion Letters (ICLs)
- Facilitate the process leading to 10 CFR 52.103(g) finding including interim operation
- Develop *Federal Register* Notice (FRN) template documenting staff determination

IT Infrastructure

- Construction Inspection Program Information Management System (CIPIMS) requires further refinement
 - List of ITAAC
 - Vendor inspection module
 - Documenting NOVs
 - Generating reports and cover letters
 - Search function
- Verification of ITAAC Closure and Evaluation System (VOICES) development

Inspections

- Functional arrangement definition
- “Report ITAAC” expectations
- Formatting of Inspection Report and Notice of Violation
- Factor into Region II/CCI planning and scheduling the NRC inspection of the Licensee’s corrective actions for each ITAAC related construction finding
- Develop a Region II/CCI process to assign, plan, complete, and document emergent inspections

Inspections

D-RAP ITAAC

- Emphasize coordination between NRC and design centers to create clear expectations of how D-RAP ITAAC will be closed
- Ensure that COL applicants understand the staff's expectations to close D-RAP ITAAC
- Licensee should collect information needed for closure of ITAAC as soon as design products issued
- Develop guidance on D-RAP package contents (ISG, Strategy Document for each design center)
- Identified that there exists an overlap between D-RAP ITAAC and Engineering Design Verification (EDV)

ITAAC Closure Verification

- ICLs should closely state the words of the ITA in the ITAAC determination basis especially when there are details how to perform the ITA, thus minimizing interpretation by reviewers
- References in ICLs should include specific documents that are material to ITAAC closure rather than only listing “ ITAAC Completion Package” as a reference
- Partial ICLs should be clearly identified as such
- ICLs are unit specific and thus should be stated clearly in the letter heading

ITAAC Closure Verification

- Enhance NEI 08-01/RG 1.215 to provide additional guidance on using ICL examples/template
- ICLs should be fully developed to avoid unnecessary resubmittals
- Develop a checklist to document the basis for verifying ITAAC closure and standardize the approach to reviewing ICLs

ITAAC Completion Packages

- Availability of Technical Reports for HQ technical staff to support R-II/CCI inspections (onsite/local reading room/virtual reading room)
- Contents of Completion Packages should include detailed electrical and installation diagrams
- Technical Reports should include details such as calculations

Next Steps (Brainstorming)

- D-RAP ITAAC
- Report ITAAC
- Surge in ITAAC submittals
- Enhancement to NEI 08-01 and RG 1.215
- DAC related ITAAC
- ITAAC maintenance
- Functional Arrangement ITAAC

Conclusion

- Demonstration has been valuable in exercising key portions of the ITAAC closure and verification processes
- Demonstration Summary Report is expected to be issued in late May 2011
- Consideration of future phases with other design centers to further test aspects of the construction inspection program