Jardaneh, Mahmoud

From:	BELL, Russ [rjb@nei.org]
Sent:	Tuesday, March 29, 2011 11:11 AM
To:	Kowal, Mark; Laura, Richard; Jardaneh, Mahmoud
Subject:	FRN Checklist
Attachments:	NRC Checklist for ITAAC Closure.docx

Attached are industry comments on the ITAAC completion review checklist. Comments are redlined and elaboration or questions are highlighted. At the end are several questions for discussion.

Thanks for the opportunity to provide comments.

Thanks.

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From: BELL, Russ
Sent: Friday, March 25, 2011 4:39 PM
To: 'Kowal, Mark'; Richard Laura
Subject: Functional Arrangement ITAAC

For discussion during our public meeting next week, the attached contains proposed additional paragraphs for NEI 08-01 to clarify the scope and purpose of Functional Arrangement ITAAC, consistent with the original intent. The case of "no figure" ITAAC is addressed and a strawman IDB proposed for one such ITAAC (AP1000 Lighting System).

Like you, we are looking at other DCDs and other flavors of FA ITAAC as input to development of appropriate generic guidance.

We look forward to the March 31 discussions.

Please reply so I know you got this message and let me know if you have any questions.

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Staff Determination of Completion of
Inypections, Tests, Analyses, and Acceptance Criteria (ITAAC) – CIPTF comments 3/29/11

Docket # [NRC-2011-0XXX]

Company ABC
Combined License (#XXXXX)
ITAAC Submittal Number # (reference ADAMS ML######)

ITAAC #_____ **Targeted_____** **Non-Targeted_____**

ITAAC Family Designation _____

Is ICL the First in ITAAC Family? **Yes_____** **No_____**

Percent of Targeted ITAAC in ITAAC Family Successfully Completed: _____

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):

1. ___ The ICL clearly identifies the licensee, the site and unit number, and the docket.

2. ___ 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.

3. ___ 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.

4. ___ The ICL affirms that the ITAAC is complete and provides a signature affirmation
    from an appropriate licensee representative.

5. ~~The IDB adequately summarizes the methodology for performing the inspection,
    test, or analysis stated in the ITAAC.~~ [This item is encompassed by Item 7. Delete.] **Formatted:** Highlight

6. ___ 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.

a. ___ 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). [The words "if they apply" are unnecessary, and a reviewer could misinterpret them to mean that he/she must determine the applicability of the generic technical justifications as part of the ICL review. This would be beyond the scope of the ICL review.]

b. ___ Does the IDB adequately summarize any required justification for ITA performance at other than the final installed location? (ICLs should contain a summary of the technical justification for ITA performance at other than the final installed location for which the generic technical justifications in Section 8.5 of NEI 08-01 do NOT apply 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.

7. ___ 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.

8. ___ All planned NRC inspections related to the ITAAC have been completed Required NRC inspections for this ITAAC have been completed, and relevant ITAAC-related construction findings and relevant ITAAC findings are confirmed closed by utilizing CIPIMS. [The language proposed by the staff is too broad. The alternative language meets the understood intent of this item but is more precise. The suggested alternative avoids potential confusion with the need to complete sufficient targeted ITAAC and the meaning of inspections "related to" the ITAAC. The proposed alternative provides the proper focus for the NRC ICL reviewer.]

9. ___ After review of the ITAAC completion letter ICL 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 is subject to 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).

[There is no need to qualify the staff determination of successful ITAAC completion. It is reasonable to note, however, that the staff's determination on one or more specific ITAAC is subject to the licensee's ability to maintain the condition that the acceptance criteria are met.]

Additional Comments (if needed) including, but not limited to:
(1) ~~explanation~~ Explanation of material differences between the ICL and associated inspection reports, [What does the staff have in mind with this item?]
(2) ~~an~~ 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. [ICLs will list references that form the basis for the licensee's ITAAC conclusion. NRC will have previously examined documentation contained in ITAAC Completion Packages for targeted ITAAC. What does the staff have in mind with this item?]

_____
_____
_____
_____
_____

NRC NRO PM Signature_____ **Date** _____

Questions for discussion w/NRC:

1. Is the ICL checklist the NRC's ITAAC determination bases document referred to in the FRN template? If not, what is the document referred in the FRN template?

2. What is the relationship of this checklist to the ICL "Acceptance Review" that NRC discussed in previous meetings?

3. How long does the staff expect it to take to review a typical ICL?

4. How will licensees receive timely feedback on the outcome of the ICL acceptance review and technical review?

5. To aid the reviewer, should the checklist include an item on whether or not the ICL is the first in a Family?

6. Should the checklist include an item on the extent to which sufficient targeted ITAAC have been completed? This item will indicate whether the NRC PM should initiate an

FRN if the staff determines that the ITAAC has been successfully completed.

7. NRC indicated during the January 27 CIP meeting that the staff was developing guidance for partial ICLs and that each subsequent ICL would supersede previously submitted ICLs. Will this checklist be used to review partial ICLs? If so, some changes will be needed.

8. To aid the reviewer, should the checklist identify whether the ITAAC is a "Reference ITAAC" and identify the referenced ITAAC that must be closed first?