

Expanded ITAAC Closure Notification Examples Project

&

ITAAC Closure Notifications Review Checklist

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Background



- 10 CFR Part 52.99(c)(1) requires that
the licensee shall notify the NRC that the prescribed inspections, test, and analyses have been performed and that the prescribed acceptance criteria have been met
- One ITAAC closure notification (ICN) template with 22 ICN examples have been developed and included in NEI 08-01, Rev. 4
- Additional 6 ICN examples were developed during the Simulated ITAAC Closure and Verification Demonstration (ITAAC Demo)

Purpose



- Lesson learned in the ITAAC Demo warranted development of additional explicit guidance
- Reduce uncertainty by standardizing ICN format for similar ITAAC; and enhancing related guidance documents

Approach



- Similar ITAAC were arranged into 48 groups that cover approx 87% of the AP1000 ITAAC
- Remainder 13% of ITAAC not covered are unique and have less generic applicability
- Correlated the NEI 08-01 and ITAAC Demo ICN examples into relevant groups
- 22 additional ICN examples should be developed to enhance guidance

Proposed Groups



PRELIMINARY LISTING OF ICN EXAMPLES

ICN Example No.	ICN Title	No. of ITAAC
1	MCR/RSW Controls Exist To Cause Components To Perform Active Functions	44
2	ASME Components/Piping Retain Their Pressure Boundary Integrity at Design Pressure	23
3	By Test Or Type Test Valves Can Actively Change Position For Design/Pre-op Conditions	22
4	As-Built Valves Qualified For Design /Pre-op Conditions Are Bounded By Tests/Type Tests By Which Qualified	8
5	Valves Upon Loss Of Motive Power Assume The Designated Design Position	10
6	As-built Class 1E Equipment Qualified For Harsh Environment Bounded by That Condition	12
19	Workers Required To Work In Suitable Workspace Environments	...
20	Components/Circuits Of One System Electrically Isolated From Ones In Another System	6
21	Battery Supplies Electrical Loads For Designated Period Of Time At A Specific Voltage	5
22	Designated Circuit Path Exists From One Electrical Component to Another	8

TOTAL ITAAC 360

ICN Group Example



- A System removes heat from another system/pool by designated components

Row No.	ITAAC No.
1.	2.2.03.08b-1
2.	2.2.04.09b.ii
3.	2.3.01.03.i
4.	2.3.06.09b.i
5.	2.3.07.08.i
6.	2.3.08.02.ii
7.	2.7.02.03b

Keys to Success



- This is a general approach that requires adding the specific details of each ITAAC
- Another lessons learned from ITAAC Demo, was that the ICNs should be written in a clear logical fashion with no errors



Proposed Schedule



- Staff provide list of ITAAC groups - 6/23
- Industry provide feedback on groups - 7/14
- Industry submit 5 initial ICN examples - 7/23
- Industry/NRC develop schedule to submit & review additional 17 ICN examples - TBD
- Industry/NRC update NEI 08-01 to provide explicit guidance for ICNs - TBD

ICN Review Checklist



- Checklist standardizes the approach to review ICNs, including the ITAAC determination basis and supporting information on ITAAC completion
- Shared initial draft checklist with industry (ML110700175)
- NEI provided comments (ML11101A033)
- Checklist will be included in the ITAAC Closure Verification Process Office Instruction

Checklist



APPENDIX A3

A. CHECKLIST FOR ITAAC CLOSURE REVIEW

Docket No. _____
 Licensee Name _____
 Combined License No. _____
 ICN ADAMS ML No. _____
 ITAAC ID No. _____ Targeted _____ Non-Targeted _____
 ITAAC Family Designation or enter N/A _____
 Name of DCIP Operations Engineer _____
 Names of Additional Reviewers _____

An operations engineer from the Office of New Reactors, Division of Construction Inspection and Operational Programs (DCIP) and other reviewers will enter "Yes" in the blank at the beginning of a statement below if the whole statement is true, "No" if any part of the statement is not true, and "N/A" if the statement is not applicable.

- a. _____ The ICN identifies all of the following: (1) licensee, (2) plant site name, (3) unit number, and (4) plant's docket number.
- b. _____ The ITAAC, as restated in the ICN, agrees with the version of the ITAAC in the combined license.
- c. _____ If ITAAC is a "Reference ITAAC", the ITAAC it references has been verified as successfully completed.
- d. _____ All ITAAC-related construction and ITAAC findings relevant to the ITAAC are listed in the ICN as closed, the NRC staff reviewer has confirmed that these findings are closed, and required Region II inspections have been completed for the ITAAC.
- e. _____ If the licensee performed the inspections, tests, and/or analyses for an as-built ITAAC at location(s) other than the final installed location, the licensee has, based on the guidance in NEI 08-01, provided in the ITAAC determination basis (IDB) of the ICN either a summary of a technical justification or a reference to a generic technical justification that establishes why it was acceptable to perform the ITAAC at location(s) other than its final installed location.
- f. _____ The ICN indicates that the licensee completed the ITAAC as affirmed by the signature of a licensee representative.
- g. _____ Person(s) with the requisite technical and engineering knowledge has/have determined that the IDB contains sufficient information, including summarizing

the methodology for performing the ITAAC, to conclude that the licensee has successfully performed the inspection, test, and/or analysis stated in the ITAAC. Person(s) with the requisite technical and engineering knowledge has/have determined that the IDB contains sufficient information to conclude that the licensee has fully met the entire acceptance criterion stated in the ITAAC.

h. _____ If statements "a" through "h" are all "Yes" or all are "Yes" except step(s) "c" and/or "e" being "N/A", the ICN has sufficient information; otherwise, the ICN is rejected, and the NRC must communicate with the licensee about providing a new initial ICN of record. If step(s) "g" and/or "h" are "No," for reasons other than insufficient information in the ICN, the DCIP operations engineer must initiate the required steps to evaluate for an ITAAC finding and subsequently the steps to evaluate other ITAAC in the same ITAAC family that may be affected by the ITAAC finding.

The reviewers can provide additional comments in the space provided below on the bases for verifying that the licensee either successfully completed the ITAAC or did not successfully complete the ITAAC including, but not limited to, identifying pertinent ICN statements, comments on performance of ITAAC at other than final installed location, listing documents reviewed from licensee's ITAAC completion package, etc.

The staff and supervisor have verified that the licensee successfully completed the inspections, tests, and analyses prescribed for this ITAAC, and that the acceptance criteria have been met. This determination of the successful completion of this ITAAC is subject to the licensee's ability to maintain the condition that the acceptance criteria are met and is based on information available at this time. This 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 of the combined license are met. The ITAAC closure verification process is not finally concluded for this ITAAC until the Commission makes an affirmative finding under 10 CFR 52.103(g). If new information subsequently disputes this determination, this ITAAC will be reopened as necessary.

DCIP Operations Engineer _____
 DCIP Branch Chief _____ Date _____
 Date _____