

Reference ITAAC Closure Notifications

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Background

- A licensee must notify the NRC for each ITAAC when its ITA has been performed and its AC met in accordance with 10 CFR 52.99(c)(1)
- Each ITAAC closure notification (ICN) must summarize with sufficient detail the licensee's basis for determining that an ITAAC was successfully completed.
- These two concepts are applicable to all ITAAC including reference ITAAC

Review and Level of Detail

- A stand alone ICN will be submitted for each ITAAC including reference ITAAC
- NRC will review all ICNs
- A reasonable person must be able to understand the licensee's basis for ITAAC completion as summarized in an ICN
- Multiple stand alone ICNs can be contained in a single submittal to the NRC

Reference ITAAC ICNs

- Will reference the ICN of each parent ITAAC
- Will only be submitted after the last parent ITAAC has been completed
- Format will differ from what is presently required in NEI 08-01 for ICNs
- If parent ITAAC is reopened, related reference ITAAC will be reopened and a supplemental ICN will need to be submitted

Conclusion

- ICNs must be sufficiently detailed
- Each ITAAC will have a stand alone ICN, including reference ITAAC
- Multiple stand alone ICNs may be contained in a single submittal to the NRC
- A new ICN example for reference ITAAC will be developed and included in NEI 08-01