

# Continuing to Improve ITAAC Closure Guidance

Planned NEI 08-01 Revisions  
CIPTF Workshop  
October 6, 2011



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# Evolution of NEI 08-01 Industry Guideline for ITAAC Closure Process Under Part 52

- Revision 3 (Jan. '09) endorsed by RG 1.215
- Revision 4 (July '10) endorsement in progress
- Revision 5 (Draft Dec. '11) for NRC review
  - Demo Project Lessons Learned
  - Clarifications/terminology
  - Additional ITAAC Closure Letter examples
  - Conformance to new ITAAC Maintenance rule

## NEI 08-01, Draft Revision 5

- Goal is improved clarity of ITAAC closure process
- Targeting Dec. 2011 submittal to NRC
- Timing of NRC endorsement – TBD
  - No impact on pending endorsement of Rev.

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# Proposed Revisions

- Terminology
  - “Corrected” ICN replaces “supplemental” ICN in section 8.1.2 re: material error or omission
- Definitions
  - Define ITAAC Closure “Notification”
    - Equivalent to ITAAC Closure “Letter”
- ITAAC Maintenance Rulemaking
  - Expand Section 3.2 on ITAAC Closure Process
    - IM Notifications
    - All Complete letter
    - “Are met” replaces “have been met” (global)

## Proposed Revisions, cont.

- Additional guidance on ICNs
  - Clarify purpose of templates vs. examples
  - Licensees may submit multiple ICNs under one transmittal letter
  - Licensees should exclude sensitive or proprietary info from ICNs
  - Option to submit partial ICNs
  - New ICNs
    - Update and scrub previous ICNs

## Proposed Revisions, cont.

- Clarify content of ITAAC Completion Packages
  - Add guidance that licensees should ensure availability of ITAAC Completion Package documentation for efficient NRC target ITAAC inspections
- Revisit guidance on 225 day letter
  - Remove guidance to discuss status of partially completed ITAAC activities
  - Remove guidance to provide additional schedule info on uncompleted ITAAC
  - Explain that 225 day letter will describe *prospectively* the ITAAC completion activities to be described in ICNs

## Proposed Revisions, cont.

- DG-1250 – NEI 08-01 conformance
  - Five IM thresholds versus four
    - Material error or omission
  - Clarify IM Threshold 1 example in NEI 08-01
    - Post Work Verification
  - Reconcile NEI comments on DG -1250
    - Performing as-built ITA at other than the final installed location
    - Post “All Complete” IM Notifications “within 24 hours”

## Proposed Revisions, cont.

- Clarify purpose of Appendix C
  - Supplemental info on common processes used in ITAAC-related activities – not guidance, per se
- Clarify scope and purpose of Functional Arrangement ITAAC
- Additional guidance on DAC – NRC Action
- Clarify IM requirements for DRAP and piping DAC (ASME Design Reports)



## Proposed Revisions, cont.

Possible additional guidance on:

- Report ITAAC
- Reference ITAAC
- IM under ASME Section III versus XI
- Mitigating impact of ITAAC surge

# Questions – Discussion



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