

ITAAC Closure Notifications Examples Review

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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)
- The final rule for 10 CFR Part 52 (72 FR 49352, 49366; August 28, 2007), states “sufficient information requires, at a minimum, a summary description of the basis for the licensee’s conclusion about completion of an ITAAC
- A reasonable person must be able to understand the licensee's basis for ITAAC completion as summarized in an ICN

10 CFR 2.309(vii)

-This information must include the specific portion of the report required by 10 CFR 52.99(c) which the requestor believes is inaccurate, incorrect, and/or incomplete (i.e., fails to contain the necessary information required by § 52.99(c)). If the requestor identifies a specific portion of the § 52.99(c) report as incomplete and the requestor contends that the incomplete portion prevents the requestor from making.....

Scope

- Industry submit new ITAAC Closure Notifications (ICNs) as part of the Expanded ICN Examples Project
- NRC review these ICNs for sufficient information to support ITAAC closure verification
- Total of 53 examples will be included in NEI 08-01 (22 existing+ 4 ITAAC Demo + 27 proposed)

ICN Example Review Preliminary Results

- ICN for AP1000 ITAAC 2.3.06.02a
- Group D-29
- Verify by inspection that the as-built components are designed and constructed per ASME Code Section III as documented in their ASME design reports and code data reports
- Issues relating to the report conclusions, reconciliation to as-built installation with the accepted design, and level of detail

Side by side comparison of submitted and proposed ICN example

ICN Example Review Preliminary Results

- ICN for AP1000 ITAAC 2.3.06.03a
- Group D-30
- Inspection verifies as-built pressure boundary welds are performed per ASME Code Section III
- Concerns with generic nature of description of NDE examinations performed and with general level of detail in ICN
- Refer to the Code's edition and year

ICN Example Review Preliminary Results

- ICN for AP1000 ITAAC 2.3.06.04b
- Group D-31
- Verify by hydrostatic test that ASME Code Section III piping conform with the requirements of ASME Codes Section III
- Concerns with hydrostatic test procedure that was not provided and with the lack of details in the ICN to support ITAAC closure verification

ICN Example Review Preliminary Results

- ICN for AP1000 ITAAC 2.1.02.12a.v
- Group D-48
- Verify that test report indicates squib valves are bounded by their tests/type tests
- Lack of details on the bounding analysis and the level of detail in the ICN to support ITAAC closure verification

General Comments

- In previous public meetings, the NRC stated that “ICN examples submitted by industry and accepted by the staff had minimal level of detail to support ITAAC closure.”
- ICNs should be unit specific (all ICNs)
- ITAAC Related Construction Finding Review should state that “Licensee performed” review...
- The use of the term “EQ”
- Reference ASME Code edition (D-29, D-30, D-31)

General Comments (cont.)

- ICNs should state in general terms why AC was met, not just defer to reference document
- The determination basis should state that reports verifying a Design Commitment not only “exist” but “conclude” that the Design Commitment was met. (D-29, D-31)
- The reconciliation of an “as-built installation” should provide sufficient information to indicate what was done and that all deviations were reconciled.

Suggestions

- Divide ITAAC determination basis into three sections: (1) Purpose of ITAAC, (2) Licensee's Methodology with important steps stated, and (3) Conclusion
- In addition, the licensee's statement for methodology should not only have its important steps, but address the full scope of ITAAC and "unique aspects" (e.g., Part 21, 50.55(e)) of that ITAAC.

Next Steps for Expanded ICN Effort

- NRC finishes review of 13 submitted ICNs
- Possible Category 2 Public Meeting!
 - Industry feedback on today's presentation
 - Results of NRC review

Referenced ICNs ML Numbers

- D-29 ML112770489
- D-30 ML112770487
- D-31 ML112770486
- D-48 (resubmittal) ML112770311