Draft ITAAC Determination Basis for ICN "Sufficiency"

[using AP-1000 ITAAC 2.3 06.02a {Example D29} as the sample]

Notes:

- Example D29 – ASME Code Section III Components ITAAC Closure Notification (submitted for inclusion in NEI 08-01) was used as the model for this draft ICN excerpt.
- Existing language in the NEI D29 proposal was retained in all cases where it did not appear to conflict or confuse staff expectations on the "sufficiency" of the submitted information.
- Each ICN is expected to "stand alone" on its merits of conveying "sufficient" information and is directed to the requirements of the specific ITAAC that it references.
- Each ICN example must be viewed in the context of the related design-specific DCD ITAAC requirements. For example, the ASME ITAAC for AP-1000 are unique and very different than the comparable ABWR ITAAC or the similar ITAAC for other designs.

ITAAC Determination Basis

Purpose of ITAAC

This ITAAC verifies that the components identified in Table 2.3.6-1 (as listed in Attachment A to this ITAAC Closure Notification), after installation in the plant (i.e., as-built), are in compliance with their approved design specifications and thus fully meet all applicable ASME Boiler & Pressure Vessel Code, Section III requirements.

Licensee's Methodology

Inspections were performed in accordance with the ASME Boiler & Pressure Vessel Code (indicate Code Edition/Date), Section III requirements to demonstrate that the as-built ASME Code Section III components identified in Table 2.3.6-1 (Attachment A) are designed and constructed in accordance with the applicable ASME Code Section III requirements. Certain pre-construction "design" provisions may have been verified by licensing reviews or as part of other ITAAC requirements.

Each component listed in Attachment A was fabricated in accordance with its Design Specification [Reference 2] and the ASME Boiler & Pressure Vessel Code (indicate Code Edition/Date), Section III requirements. The ASME Code Section III Design Reports for these components exist and document that the as-built components conform to approved design details. These reports are included in the required ASME Code Section III Code Data Report for each code stamped component listed in Appendix A. These individual component Code Data Reports, which document final accepted construction of the referenced component, are included as part of the ASME Section III N-5 Code Data Report(s) for the applicable piping systems (i.e., RNS, RCS, list others, as applicable). [Reference 3]

In accordance with the ASME Boiler & Pressure Vessel Code, Section III requirements, all the as-built, piping systems containing any of the components listed in Attachment A, have been subjected to a reconciliation process [Reference 4], which verifies that the as-built piping systems have been analyzed for applicable loads (e.g., stress reports) and for compliance with all Design Specification and Code provisions. Design reconciliation of the as-built systems, including installed components, validates that construction completion, including field changes and any nonconforming condition dispositions, is consistent with and bounded by the approved design. All applicable fabrication, installation, and testing records, as well as those for the related QA verification/ inspection activities, which confirm adequate construction in compliance with the ASME Code and design provisions, are included in Reference 5.

Conclusion

The applicable ASME Section III N-5 Code Data Report(s), which include the Design Reports for all the components listed in Appendix A, exist and conclude that these components have been designed and constructed (including their installation within the applicable as-built piping system) in accordance with the ASME Boiler & Pressure Vessel (indicate Code Edition/Date), Section III requirements.

References (available for NRC inspection)

1. NEI 08-01, Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52
2. List of Design Specifications for all components specified in Appendix A
3. ASME Section III N-5 Code data Report(s) for the RNS, RCS (and other applicable) systems
4. Licensee's Program for As-Built Design Reconciliation of the ASME Piping Systems
5. ITAAC 2.3 06.02a Completion Package {note that this reference number has changed}