

# ITAAC Closure Notifications Examples Review

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Ed Kleeh, PE  
Mahmoud Jardaneh, PE  
NRO/DCIP/CTSB/CIT

# 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)
- 15 of proposed 27 examples have been submitted
- Additional ICN examples may be added as the project progresses

# ICN Example Review Results

- ICN for AP1000 ITAAC 2.1.02.07a.ii
- Group D-32
- Verify by inspection that as-built Class 1E equipment, associated wiring, cables, , and terminations qualified for a harsh environment are bounded by tests, analyses, or both
- The term ~~equipment mounting~~ should be restated as “Class 1E equipment mounting, associated wiring, cables, and terminations”

# ICN Example Review Results (cont.)

- ICN for AP1000 ITAAC 2.1.02.07a.ii
- Group D-32
- As-designed ~~equipment~~ should be stated as as-designed Class 1E Equipment
- Qualified ~~components~~ and installed ~~components~~ should be stated as qualified Class 1E equipments and installed Class 1E equipments
- Level of detail in the example is sufficient 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
- In addition to the verification of the as-designed equipment mounting, the ITAAC Determination Basis should include the verification of the valve orientation
- Level of detail in the example is sufficient to support ITAAC closure verification

# Previous Comments Follow up

- ICN examples submitted by industry and accepted by the staff had minimal level of detail to support ITAAC closure
- ICNs should state in general terms why AC was met, not just defer to reference document
- ICNs should be unit specific. Remove the (s) from all Unit and Docket #s (all ICNs)

# Previous Comments Follow up

- Divide ITAAC determination basis into three sections: (1) Purpose of ITAAC, (2) Licensee's Methodology with important steps stated, and (3) Conclusion
- 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

- Before incorporating the new ICN examples into NEI 08-01, revise them to address all previously provided general comments
- Industry resubmit ICN examples (D44 and D47) for NRC review
- Industry submits the remaining 12 ICN examples for NRC review
- Industry and NRC explore the possibility of revising some of the ICN examples in NEI 08-01

# Referenced ICNs ML Numbers

- D-32
- D-48

**ML113320434**

**ML113320440**