

ITAAC Closure Notifications Examples Review

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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 09-01

Referenced ICNs ML Numbers

- D-32 ML113320434
- D-48 ML113320440