

Westinghouse Electric Company

225 Day Letter

Proposed Modifications to NEI 08-01

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Agenda

- Background – Purpose of 225-Day Letter
- Rationale for Proposed Changes
- Summary of Proposed Changes
- Details of Proposed Updates to NEI 08-01
- Example – AP1000 ITAAC 2.1.01.04 in new format

Background – Purpose of 225 Day Letter

- 10 CFR 52.99(c)(2) requires a notification 225 days prior to scheduled fuel load that all uncompleted ITAAC will be met.

The notification... must provide sufficient information to demonstrate that the prescribed inspections, tests, or analyses will be performed and the prescribed acceptance criteria for the uncompleted ITAAC will be met, including, but not limited to, a description of the specific procedures and analytical methods to be used for performing the prescribed inspections, tests, and analyses and determining that the prescribed acceptance criteria are met.

- Identical in existing and proposed rule (except for “Acceptance Criteria *have been/are* met.”)

Rationale for Proposed Changes

- Changes will still fully comply with 52.99(c)(2) and the intent of NEI 08-01
- Some 225-Day Letter features in NEI 08-01 will pose a significant implementation difficulty
- The Proposed changes reduce error-likely situations
- Includes Lessons-Learned from the ITAAC Demonstration Project

Summary of Proposed Changes

1. Minor NEI 08-01 Guidance changes to format the 225-Day Letter more similar to the ICN
 - Add an “ITAAC Completion Description” very similar to the ITAAC Determination Basis in the ICN
 - Describes the methodology for conducting the ITAAC and the results that are used to demonstrate the Acceptance Criteria will be met
 - Lists the expected Principal Completion Documents as References
 - Written in future tense (even though some activities may have been completed)

Summary of Proposed Changes

2. Clarify the Basis for expectation that the ITAAC will be successfully completed before fuel load.
 - The “ITAAC Completion Description” provides the information to demonstrate that the ITA will be performed, and the AC met
 - The individual ICN’s and the “All ITAAC Complete” Notification provide confirmation that the ITAAC were successfully completed

Summary of Proposed Changes

3. Remove the “ITAAC Closure Schedule” section of the 225-Day Letter
 - Schedule information is proprietary and withheld from public disclosure
 - Detailed schedule information is already provided to NRC staff on a monthly basis per 10 CFR 52.99(a)

Summary of Proposed Changes

4. Remove the Actions Achieved/Remaining Section
 - Replaced by ITAAC Completion Description
 - Similar to Schedule Information
 - 52.99(c)(2) does not require current status of ITAAC Completion, only information to demonstrate the ITA will be performed and the AC met
 - Potential error-likely situation with rapidly changing construction schedule

Detailed Markup of NEI 08-01

Proposed Change #1

The template for the ITAAC-specific attachments to the 225-day notification(s) provides for the following items:

- ITAAC statement – restates the ITAAC, including the design or COL commitment, inspection, test or analysis; and acceptance criteria.
 - Action under **INSERT**
 - Action completed
 - ITA
 - List of site.
- ITAAC Completion Description – similar to the Determination Basis in an ITAAC Closure Notification, describes the methodology for conducting the ITA and the results that will be used to demonstrate that the Acceptance Criteria will be met.

Detailed Markup of NEI 08-01

Proposed Change #2

7 **GUIDANCE ON SUFFICIENT INFORMATION FOR 225-DAY NOTIFICATION OF UNCOMPLETED ITAAC**

As explained in Section 3.2.1 of this document, the licensee is required under 10 CFR

The description of the specific procedures and analytical methods that will be used for performing the inspections, tests, and analyses provides sufficient information to demonstrate that the ITA will be successfully completed and the prescribed acceptance criteria will be met. **REVISE**

~~these notifications concern ITAAC that have yet to be completed, they should also provide some basis for the expectation that the ITAAC will be successfully completed before fuel load. To REVISE The individual ICN's and the "All ITAAC Complete" notification later provide confirmation that the ITAAC were successfully completed.~~

Detailed Markup of NEI 08-01

Proposed Changes #3 and #4

The template for the ITAAC-specific attachments to the 225-day notification(s) provides for the following items:

- ITAAC statement – restates the ITAAC commitment, inspection, test or analysis; and accepts the **Completion Description**
- ~~Actions achieved toward ITAAC completion~~ – describes actions that are already underway or completed.
- ~~Actions remaining to attain ITAAC completion~~ – describes actions remaining to complete the ITAAC.
- ~~ITAAC completion schedule~~ – provides planned schedule to complete the ITAAC.
- List of references – primary references that will be available for NRC review at the site. **Already provided to NRC, and proprietary**

Example Format Using NEI 08-01D-6 and E-2



Microsoft Office
Word Document

Summary

- The new proposed 225-day letter format continues to meet the requirements of 10 CFR 52.99(c)(2) and the intent of NEI 08-01
- The new proposed format has several benefits:
 - Helps streamline the administrative process for letter preparation
 - Removes concerns for schedule information that is rapidly changing and proprietary
 - Leverages Demonstration Project lessons learned and the Expanded ICN Project