

January 16, 2012

Dr. Said Abdel-Khalik, Chairman
Advisory Committee on Reactor Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: DRAFT FINAL REGULATORY GUIDE 1.215, "GUIDANCE FOR ITAAC
CLOSURE UNDER 10 CFR PART 52"

Dear Dr. Abdel-Khalik:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your letter dated December 8, 2011, to Chairman Gregory B. Jaczko. Your letter summarizes the views of the Advisory Committee on Reactor Safeguards (ACRS or the Committee) on the proposed requirements for the maintenance of inspections, tests, analyses, and acceptance criteria (ITAAC) and draft final Regulatory Guide (RG) 1.215, "Guidance for ITAAC Closure under 10 CFR Part 52," Revision 1. The staff and I appreciate your continued interest and comments on the development of the ITAAC maintenance rule and its associated guidance.

Soon after the issuance of RG 1.215 in October 2009, the NRC staff and the industry began developing the processes for ITAAC maintenance and identifying how these processes would support the finding required under Title 10 of the *Code of Federal Regulations* (10 CFR) 52.103(g). The staff identified additional reporting requirements associated with ITAAC maintenance and promoted their codification given their importance and equivalence to the existing notifications already in 10 CFR 52.99, "Inspection during Construction." Industry guidance from the Nuclear Energy Institute (NEI), NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52," Revision 4, contains appropriate guidance on ITAAC maintenance and also includes detailed discussion of other important areas related to ITAAC closure. Draft Final RG 1.215, Revision 1, endorses NEI 08-01.

Your letter of December 8, 2011, includes the following recommendations for which associated responses are provided:

ACRS Recommendation 1

The proposed ITAAC rule, "Requirements for Maintenance of Inspections, Tests, Analyses, and Acceptance Criteria," meets the goal of ensuring maintenance of ITAAC validity and should be approved.

NRC Response

The staff agrees with the position that the proposed rule ensures the maintenance of ITAAC validity.

ACRS Recommendation 2

The approach in RG 1.215, Revision 1, for closing and maintaining ITAAC should be revised to include an assessment that ensures a change does not introduce unintended consequences. The assessment should also include an evaluation that confirms the original inspections, tests, and analyses and their acceptance criteria are still valid and assures the functionality originally intended.

NRC Response

The staff agrees that it should clarify RG 1.215 accordingly. The following paragraph will be included in RG 1.215, Section B, where the requirements of NEI 08-01, section 8 are discussed.

The design and configuration control program should include an assessment and evaluation that confirms that the *ITAAC* potentially affected by a proposed change are still valid and assures the functionality originally intended.

ACRS Recommendation 3

After revision, RG 1.215, Revision 1, should be issued.

NRC Response

The staff agrees and will issue RG 1.215, Revision 1, after making the revision stated in response to Recommendation 2 above.

The staff and I appreciate the comments and recommendations provided by ACRS. We look forward to continuing to work with the Committee as the staff develops the final regulatory guidance and also the internal processes to verify the satisfactory completion of ITAAC and design acceptance criteria by the licensee.

Sincerely,

/RA by Martin J. Virgilio for/

R. W. Borchardt
Executive Director
for Operations

cc: Chairman Jaczko
Commissioner Svinicki
Commissioner Apostolakis
Commissioner Magwood
Commissioner Ostendorff
SECY

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