

Regulatory Guide 1.215

- Regulatory Guide (RG) 1.215 of October 2009

- Guidance for ITAAC closure under 10 CFR PART 52
- Endorses the methodologies described in NEI 08-01 Revision 3
- Includes the following guidance:

Operation (which includes loading fuel) cannot commence until the Commission finds under 10 CFR 52.103(g) that all acceptance criteria in the ITAAC are met. To provide a basis for the Commission's finding and to ensure that ITAAC closure notifications contain sufficient information to satisfy 10 CFR 52.99, the licensee can follow industry guideline NEI 08-01.

-and-

The NRC issues regulatory guides to describe to the public methods that the staff considers acceptable for use in implementing specific parts of the agency's regulations, to explain techniques that the staff uses in evaluating specific problems or postulated accidents, and to provide guidance to applicants. Regulatory guides are not substitutes for regulations and compliance with them is not required.

NEI 08-01

- NEI 08-01 Revision 3 of January 2009
 - Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52
 - Benefited from NRC public workshops and NRC review and comment
 - Includes the following:
 -generic guidance for the ITAAC program for new nuclear plants licensed under 10 CFR Part 52.*
 -to provide all stakeholders a common framework and understanding of the Part 52 ITAAC closure process.*
- NEI 08-01 Revision 4 issued July 2010.
- Regulatory Guide (RG) 1.215 Revision 1 will be issued and will 'Endorse' 08-01 Revision 4

NEI 08-01

- NEI 08-01 Draft Revision 5 delivered to the NRC this month for comment.
 - Overview of Rev 5 Changes
 - 3.1.1 – Expect NRC staff to credit applicable portions of EDV inspection results for verification of D-RAP ITAAC closure, performing supplemental D-RAP inspection(s) as necessary.
 - 3.1.1 – Suggests licensees discuss in advance with NRC staff the process for completion of D-RAP ITAAC to align expectations concerning D-RAP ITAAC closure and Engineering Design Verification (EDV) inspection planning.
 - 6 – Describes process for partial submittal notifications for complex ITAAC
 - 7 – Described the uncompleted ITAAC notification process
 - 8 – Various edits to their post ITAAC closure notification process

NEI 08-01

– Overview of Rev 5 Changes cont'd

10.1.2 - Major changes to the methodology utilized in the initial design or significant changes in the scope of the design (i.e. a new piping subsystem) would require a License Amendment Request.

10.1.3 - Expects NRC staff to perform a confirmatory review only to approve DAC implementation for licensees that reference standard design DAC information previously approved by the staff.

10.4 - Entire section added to describe the Design Reliability Assurance Program
ITAAC Closure

10.5 - New section on Functional Arrangement ITAAC

10.6 - New section on Reference ITAAC

Appendices - Templates removed