

ITAAC Closure Notifications Examples Review

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Scope

- Industry submits new ITAAC Closure Notifications (ICNs) as part of the Expanded ICN Examples Project
- NRC reviews these ICNs for sufficient information to support ITAAC closure verification
- 53 examples will be included in NEI 08-01 (22 existing + 4 unique ITAAC Demo + 27 proposed)
- Additional ICN examples may be added as the project progresses
- 21 of the proposed 27 examples have been submitted + 1 Site Specific ICN

ICN Example Review Results

- ICN for AP1000 ITAAC 2.6.03.04c
- Group D34
- Battery Bank Load Testing ITAAC
- Level of detail in the example is sufficient to support ITAAC closure verification

ICN Example Review Results

- ICN for AP1000 ITAAC 2.6.06.01.iii
- Group D35
- Equipment Grounding System ITAAC
- Verification included visual check of and resistance check across each connection
- Level of detail in the example is sufficient to support ITAAC closure verification

ICN Example Review Results

- ICN for AP1000 ITAAC 2.6.03.04f
- Group D36
- 24-hour Inverter Load Testing ITAAC
- ITA requires resistive load greater than 12 kW, but the IDB states that the test was performed by applying a simulated load at the inverter's design capacity of 12 kW
- Attachment 1 lists the wrong components

ICN Example Review Results

- ICN for AP1000 ITAAC 3.3.00.06a
- Group D38
- Inspection of Available Room Volume ITAAC
- When calculating the available volume in the room, it is not clear if equipment without manufacturer's data (e.g. cable trays, piping, columns, etc.) was accounted for

ICN Example Review Results

- ICN for AP1000 ITAAC 3.5.00.05
- Group D39
- Inspection of Radiation Monitors ITAAC
- The term "exists," when used in the Acceptance Criteria, means that the item is present and meets the design description in the appropriate sections of the SAR. The IDB only confirms that the item is present
- The location of the Containment Air Filtration Exhaust Monitor is incorrect (Attachment 1)

ICN Example Review Results

- ICN for AP1000 ITAAC 2.2.02.05a.ii
- Group D44
- Seismic Qualification ITAAC
- In order for the IDB to be consistent with the ITA, state that type test and analysis were used to qualify the valves, rather than test and analysis
- Level of detail in the example is sufficient to support ITAAC closure verification

ICN Example Review Results

- ICN for AP1000 ITAAC 2.1.02.12a.i
- Group D47
- Active Safety-Related Function ITAAC
- In order for the IDB to be consistent with the ITA, state that safety-related active valves are required to operate under their design condition, rather than limiting it to licensing basis transients or events
- Level of detail in the example is sufficient to support ITAAC closure verification

ICN Example Review Results

- ICN for AP1000 ITAAC 2.3.10.07b
- Group D53
- Simulated Signal Causes WLS Isolation Valve to Actuate
- The IDB should state that the pre-test condition was verified. This will provide assurance that the signal caused the valve to change position
- Level of detail in the example is sufficient to support ITAAC closure verification

ICN Example Review Results

- ICN for Site Specific Vogtle Unit 3 ITAAC
E.3.9.06.00.05 ~~E.3.8.01.06.05~~
- Example S1
- Site Specific Emergency Planning ITAAC
- The ITA and AC wording does not match the latest revision in the License. ITAAC number is incorrect
- IDB should clearly state that, in addition to the field monitoring team, the EOF adequately demonstrated the capability to make the rapid assessment

Next Steps for Expanded ICN Effort

- Before incorporating the new ICN examples into NEI 08-01, all previously provided general comments should be addressed
- Industry resubmit ICN examples (D36, D38, D39, S1) for NRC review
- Industry submits the remaining 6 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

● D34	ML120410193
● D35	ML120410207
● D36	ML120410210
● D38	ML120410221
● D39	ML120410233
● D44 (Resubmittal)	ML120410241
● D47 (Resubmittal)	ML120410253
● D53	ML120410261
● S1	ML120410268