



NUCLEAR ENERGY INSTITUTE

Russell J. Bell
DIRECTOR
NEW PLANT LICENSING
NUCLEAR GENERATION DIVISION

February 1, 2012

Ms. Laura A. Dudes
Director, Division of Construction Inspection and Operational Programs
Office of New Reactors
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: NEI 08-01, *Industry Guideline for the ITAAC Closure Process Under 10 CFR 52*,
Draft Revision 5

Project Number: 689

Attached for NRC review is NEI 08-01, *Industry Guideline for the ITAAC Closure Process Under 10 CFR 52*, Draft Revision 5. This revision reflects pending new requirements related to ITAAC Maintenance, lessons learned from the DOE-sponsored Simulated ITAAC Closure and Verification Project, and other enhancements that reflect understandings achieved in numerous public meetings over the past 18 months.

Through our numerous public meetings, the NRC staff and industry are developing a fuller understanding of ITAAC closure and verification processes, as well as tools for successful implementation such as guidance and procedures. NEI 08-01 is the principal industry guidance document on ITAAC closure, and we have updated and expanded it as our understanding has grown. ITAAC closure guidance contained in Revision 3 of NEI 08-01 was endorsed by the NRC in Regulatory Guide 1.215, *Guidance for ITAAC Closure Under 10 CFR Part 52*. In July 2010, we submitted Revision 4 of NEI 08-01, which provided guidance on maintaining the validity of ITAAC conclusions following submittal of ITAAC Closure Notifications in support of the final finding required by 10 CFR 52.103(g) that all ITAAC are met. The NRC is in the process of endorsing Revision 4 at this time via update to RG 1.215.

Revision 5 of NEI 08-01 represents another critical mass of enhancements, clarifications and lessons learned concerning ITAAC closure and maintenance. NEI 08-01 is the primary basis for plant-specific ITAAC closure programs, and the new and updated guidance in Revision 5 needs to be consolidated so that plant specific implementing programs/procedures can be finalized and used in 2012 with confidence by the lead projects and others.

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As such, we request NRC staff review and feedback on Draft Revision 5. The attached draft is complete with the exception of the ITAAC Closure Notification (ICN) examples in Appendix D. The attached Appendix D currently contains only the updated template for preparing ICNs. As discussed in our public meetings, we are in the process of expanding the set of example ICNs and plan to include these in Appendix D of Revision 5 when that work is done. In addition, we are updating the existing examples to ensure they conform to the latest form and content guidance in the updated ICN template.

We request that the staff review and provide feedback on Draft Revision 5 in parallel with completion of RG 1.215, Revision 1 (expected in May 2012). It is likely that our understanding of ITAAC closure and verification will continue to grow in 2012 based on early experience on the lead projects at Vogtle and Summer. Thus, we recognize it may be premature to initiate another update of RG 1.215 at this time. Instead, we propose that after resolving any NRC comments on Draft Revision 5 and restoring Appendix D, the NRC provide a letter to NEI indicating that the new and updated guidance in Revision 5 is consistent with the staff's views on ITAAC closure and verification and provides an acceptable basis for plant specific ITAAC closure programs. To enable completion of NEI 08-01, Revision 5, as soon as practicable in support of early ITAAC closure activities, NRC comments on attached draft are requested by March 15, 2012.

We appreciate the NRC's continued focus on CIP issues related to ITAAC closure and verification and our continuing series of constructive interactions on these and related issues. While the NRC and industry teams familiar with these issues are available to the task, it is important to address NRC staff comments on the new and updated guidance attached so that Revision 5 of NEI 08-01 can be completed and made available for use.

If you have any questions, please contact me.

Sincerely,



Russell J. Bell

Attachment

C: Mr. Mark G. Kowal, NRO/DCIP/CITB, NRC
Ms. Amy Cubbage, NRO/DARR/APOB, NRC
NRC Document Control Desk