



U.S. Nuclear Regulatory Commission

Office of New Reactors

Office Instruction

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Responsible Organization: **NRO/DCIP/HOIB**

Summary: This revision to the office instruction (OI) provides updated guidance that reflects experience for the review and acceptance of the notifications for the completion of inspections, tests, analyses, and acceptance criteria (ITAAC) submitted in accordance with the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 52, "Licenses, Certifications, and Approvals for Nuclear Power Plants."

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NRO Office Instruction NRO-REG-103

Inspections, Tests, Analyses, and Acceptance Criteria Closure Verification Process

TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE NUMBER</u>
1.0 PURPOSE	1
2.0 GENERAL INFORMATION AND GUIDANCE	1
3.0 SPECIFIC REQUIREMENTS OF ITAAC CLOSURE VERIFICATION PROCESS (ICVP)	5
4.0 VERIFICATION OF ITAAC CLOSURE, EVALUATION, AND STATUS (VOICES)	12
5.0 PERFORMANCE GOALS AND MEASURES	12
6.0 REFERENCES	13

APPENDICES

A1	Example <i>Federal Register</i> Notice Announcing the Closure of the Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC)
A2	Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Closure Verification Evaluation Form (VEF) for an ITAAC Closure Notification (ICN)
A3	Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Notification Checklist (UINC)
A4	Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Closure Verification Evaluation Form (VEF) for an ITAAC Post-Closure Notification (PCN)
A5	ITAAC Lead Reviewer Training and Qualification

NRO Office Instruction

NRO-REG-103

Inspections, Tests, Analyses, and Acceptance Criteria Closure Verification Process

1.0 PURPOSE

To provide guidance for the staff's review and acceptance of licensees' Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) notifications submitted in accordance with the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 52.99(c), "Inspection during construction; ITAAC schedules and notifications; NRC notices."

2.0 GENERAL INFORMATION AND GUIDANCE

In the Energy Policy Act of 1992, Congress added Section 185b (42 USC 2235(b)) to the Atomic Energy Act of 1954, as amended, which states, "Following issuance of the combined license [COL] the Commission shall ensure that the prescribed inspections, tests, and analyses [ITA] are performed, and prior to operation of the facility, shall find that the prescribed acceptance criteria [AC] are met." This requirement is reflected in two NRC regulations. First, 10 CFR 52.99(e) requires the U.S. Nuclear Regulatory Commission (NRC) to ensure that the prescribed ITA for all COL ITAAC are performed and to publish in the *Federal Register* the staff's determination of their successful completion. Second, the NRC must make its finding under 10 CFR 52.103(g) that all the COL acceptance criteria are met before the licensee can operate the facility.

To support these NRC determinations and findings, licensees are required by 10 CFR 52.99(c) to submit certain notifications to the NRC, three of which are described below. In reviewing these notifications, the staff should refer to the following guidance: Regulatory Guide (RG) 1.215, "Guidance for ITAAC Closure Under 10 CFR Part 52," and Nuclear Energy Institute (NEI) 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52." In RG 1.215, the NRC approved the use of the industry guideline NEI 08-01, subject to certain exceptions and additional guidance stated in RG 1.215.

2.1 ITAAC Closure Notification

Section 52.99(c)(1), "ITAAC closure notification," requires a licensee to submit ITAAC closure notifications (ICNs) to the NRC that provide sufficient information to demonstrate that the prescribed ITA have been performed and the prescribed AC are met.

2.2 ITAAC Post Closure Notification

Section 52.99(c)(2), “ITAAC post-closure notification [IPCN],” requires a licensee to notify the NRC, in a timely manner, of new information that materially alters the basis for determining either that the inspections, tests, or analyses for an ITAAC were performed as required, or that the acceptance criteria are met. In accordance with 10 CFR 52.99(c)(2), these notifications are required during the period from the licensee’s ICN submission to the NRC’s finding under 10 CFR 52.103(g). This period is known as the ITAAC maintenance phase. Each ITAAC post-closure notification (IPCN) must contain sufficient information to demonstrate that, notwithstanding the new information, the prescribed inspections, tests, or analyses have been performed as required, and the prescribed acceptance criteria are met.

The rule creating 10 CFR 52.99(c)(2) (77 FR 51880, 51888; August 28, 2012) discusses five ITAAC maintenance thresholds for when an IPCN would be required:

- Material Error or Omission—Is there a material error or omission in the original ICN?
- Post Work Verification (PWV)—Will the PWV use a significantly different approach than the original performance of the ITA as described in the original ICN?
- Engineering Change—Will an engineering change be made that materially alters the determination that the acceptance criteria are met?
- Additional Items to be Verified—Will there be additional items that need to be verified through the ITAAC?
- Complete and Valid ITAAC Closure Representation—Will any other licensee activities materially alter the ITAAC determination basis?

These thresholds are discussed, with numerous examples, in NEI 08-01. If an ITAAC maintenance threshold has been exceeded, it may require that: 1) the ITA be re-performed, 2) an alternative method of verification be utilized, or 3) a license amendment request, and possibly an exemption request, be initiated.

2.3 Uncompleted ITAAC Notification

10 CFR 52.99(c)(3), “Uncompleted ITAAC notification [UIN],” requires licensees to notify the NRC of how uncompleted ITAAC will be successfully completed. Specifically, if the NRC has not received the ICNs for all ITAAC, by 225 days before the scheduled date for initial loading of fuel, 10 CFR 52.99(c)(3) requires the licensee to submit Uncompleted ITAAC notification (UINs) to the NRC that provide sufficient information demonstrating that the prescribed inspection, tests, or analyses for all uncompleted ITAAC will be performed and that the prescribed acceptance criteria will be met prior to operation. As required by 10 CFR 52.99(c)(3), “sufficient information” includes, but is not limited to, a description of the specific

procedures and analytical methods to be used for performing the ITA and determining that the AC are met. UINs must be provided no later than 225 days before the scheduled date for initial loading of fuel. After these uncompleted ITAAC are completed, the licensee will submit ICNs for them.

A licensee may submit UINs to the NRC for review significantly earlier than 225 days before the scheduled date of initial fuel load. However, unlike ICNs and IPCNs, review and acceptance by the NRC is not a requirement for UINs. Although not a requirement, the early review of UINs is beneficial to both the NRC and stakeholders since it allows the public more time to assess the licensee's ITAAC completion method and also allows the NRC to review more efficiently the associated ICNs. Early review of UINs also serves to resolve issues with an ITAAC's interpretation, the licensee's proposed methodology, or the UIN's possible lack of sufficient information prior to the licensee's submittal of the ICN. The NRC makes all ITAAC notifications (ICNs, UINs, and IPCNs) and communications to a licensee about those notifications publically available.

The licensee may update UINs submitted significantly earlier than 225 days prior to schedule fuel load. For example, the NRC staff informed the licensee for the reactors under construction that if the licensee materially changes its methodology for completing the ITAAC, an updated notification before the ITAAC hearing process begins would be desirable to support the hearing process. An updated UIN supersedes its previous UIN in the information technology system Verification of ITAAC Closure, Evaluation, and Status (VOICES).

2.4 Clarifications on ITAAC Terminology

To clarify terminology used in the NRC endorsed guideline NEI 08-01, note that the guideline uses the terms "ITAAC conclusion" and "ITAAC determination" interchangeably in reference to a licensee's assessment that an ITAAC has been implemented and completed. To make this determination, a licensee must perform the ITA and show that the AC of an ITAAC are met. Additionally, IPCNs were referred to as ICN supplements in NEI 08-01. The NRC's verification effort to determine if a licensee has successfully completed an ITAAC is referred to as a "closure review." The ITAAC are not considered finally closed by the NRC until the 10 CFR 52.103(g) finding has been made.

The term "ITAAC" envelops all ITAAC types. This OI refers to some ITAAC separately; specifically "design acceptance criteria (DAC)" and "reference ITAAC." DAC define design processes instead of actual design details. The licensee and the NRC may resolve some DAC or parts of them before COL issuance, and the NRC will evaluate others by the ITAAC Closure Verification Process (ICVP). A "reference ITAAC" refers to the performance requirements of another ITAAC (the parent ITAAC) for its completion. When the "parent ITAAC" is verified as completed, the "reference ITAAC" can also be considered complete.

2.5 Communications with the Licensee and Interested Stakeholders

Communication with the licensee to discuss the NRC staff's comments or inability to accept a submitted ICN, IPCN, or UIN will typically be conducted in a public meeting. The discussion should be summarized, made publically available on the docket, and explain the bases for the staff's concerns with the ICN, IPCN, or UIN and any agreed upon resolutions. If a revision is necessary, the licensee must address the identified deficiencies and submit a new notification of record, which the NRC will review in accordance with the ICVP. The new ICN, IPCN, or UIN will supersede the original notification. VOICES will track the superseded documents as a previous revision.

Routine public meetings are established as an efficient and effective way to facilitate frequent and transparent communications with the licensee and interested stakeholders to: 1) resolve emerging issues associated with ITAAC closure, including concerns or issues with a specific ICN, IPCN, or UIN review and 2) discuss schedules for expected ICN and UIN submittals, allowing for the early identification of resource assignments. Meeting summaries are issued no later than 30 days after the meeting. As the end of construction nears, public discussions may be needed on short notice to resolve any ITAAC closure issues that are critical to maintaining key milestones associated with the 52.103(g) finding.

2.6 Outcomes Resulting from ITAAC Demonstration Project

There are a number of actions that resulted from the ITAAC Demonstration Project and are being tracked to completion via the Action Plan. A number of them are reflected within the update to this office instruction (OI). A few of those actions that are most suitable for general information and guidance are highlighted below.

The original practice to status a non-targeted ITAAC as conditionally verified until half of the targeted ITAAC within the same ITAAC family have been verified was evaluated and determined to be unnecessarily restrictive for efficient processing of ITAAC closures. This practice has been eliminated.

The use of technical reviewers to assist the reviews of UINs, ICNs, and IPCNs, is normally at the discretion of the lead reviewer or lead approver. Considerations for selecting a technical reviewer are the content of the notification's determination basis, and the familiarity of the subject matter to the lead reviewer. Normally, the lead reviewer is responsible for overseeing the verification work completed by technical staff.

Workshops with industry have proven to be an effective method to identify and resolve issues in the process, and will continue to be scheduled, as appropriate, to further refine and enhance the ITAAC closure process on an as-needed basis.

3.0 SPECIFIC REQUIREMENTS OF ITAAC CLOSURE VERIFICATION PROCESS (ICVP)

In general, experience in executing the ICVP thus far for Vogtle Units 3 and 4 has demonstrated that for submittals that are closely aligned with the examples in NEI guideline 08-01, the process described below can be executed more quickly. In the vast majority of cases, the lead reviewer in the ITAAC Branch conducts the primary NRC review. Experience has shown that a referral to the technical reviewer (with the exception of ITAAC in the purview of Office of Nuclear Security and Incident Response (NSIR) as discussed later) is infrequent. In cases where referral to the technical reviewer is considered necessary, the purpose is to confirm with the NRC's technical expert that the ITAAC is appropriately characterized as having been successfully completed. The below guidance provides detailed information to the NRC staff for how to process all cases, even those that are exercised infrequently, within the ICVP to ensure that an efficient and robust methodology is adhered to for the processing of all ITAAC closures.

The roles of the *Lead* and *Technical Approvers* are primarily to ensure proactive management of the efficient use of staff resources, and to ensure the overall quality and technical consistency of the staff review process.

3.1 Notification Receipt and Initial Processing

Licensees typically submit required notifications electronically. The NRC staff and the licensee for the reactors under construction agreed to the following process for the submission of multiple ICNs, IPCNs, and UINs under one cover letter:

- Each ICN, IPCN, or UIN will be provided in a separate enclosure to the cover letter.
- Each ICN, IPCN, or UIN may be for a single unit or for multiple units performing the identical ITAAC.
- Each enclosure will contain the associated unit and docket number(s).
- When submitting the package to the NRC, the cover letter will be provided in one portable document format (pdf) file and each enclosure in a separate pdf file without the cover letter.
- Each individual pdf file will be given a unique ML number in ADAMS.
- The title of the cover letter will include all ITAAC that are provided as enclosures and the body of the cover letter needs to include a list of the enclosures. This will allow an individual enclosure to be replaced if it needs a subsequent revision(s).
- The file size limitations for web electronic submittal is 100 MB; larger files will need to be submitted via compact disc.

- If only one ICN/UIN is being submitted, separate pdfs of the cover letter and enclosure are not needed (can be one pdf).

The Office of the Chief Information Officer (OCIO) will process the notification and will generate an email notification (e-RIDS) informing the staff of the receipt of the notification and associated ML number.

The assigned licensing *Project Manager (PM)*, upon receipt of an e-RIDS notification for an ICN, IPCN, or UIN, initiates the ICVP within VOICES by: 1) entering the date received as stamped on the licensee's notification and its associated ML number, 2) changing the VOICES status to "Received," and 3) assigning a *Lead Approver*.

NOTE:

Prior to assigning a *Lead Approver*, the *PM* shall ensure there are no current licensing actions in process that could affect closure of the ITAAC. If there are licensing issues that affect closure of that particular ITAAC, the *PM* shall select in VOICES the "*Licensing Issues Pending*" status and shall inform the affected licensee that the ITAAC review cannot proceed until the licensing issues are resolved. After the licensing issues are resolved, the *PM* shall change the ITAAC review status in VOICES to "*Received*" and assign a *Lead Approver*.

The *PM* may delete a given ITAAC in VOICES following approval of a license amendment deleting that ITAAC by selecting "Deleted" in the notification status block.

NOTE:

Alternatively, for license amendments that impact a number of ITAAC or which add new ITAAC, the changes will be implemented by the information technology (IT) group responsible for the VOICES program per request of the branch responsible for the ICVP. Changes to VOICES and Construction Inspection Program Information Management System (CIPIMS) shall not be made until the license amendment has been issued.

3.2 Notification Assignment

The *Lead Approver* shall change the notification status in VOICES to indicate that the notification is under review and assign a *Lead Reviewer*. While anticipated to be infrequent as discussed previously, the *Lead Approver* may request technical assistance by selecting the appropriate technical area and assigning a *Technical Approver* within VOICES. The *Technical Approver* will in turn assign a *Technical Reviewer* to assist the *Lead Reviewer*.

NOTE:

All security and emergency preparedness ITAAC notifications will be sent to the designated *Technical Approver* in NSIR for assignment to the appropriate NSIR *Technical Reviewer*, who will assist and concur in the disposition of the notification by the Lead Reviewer. NSIR, at their discretion, may choose to waive this requirement as more experience is gained. The practice of referring all security and emergency preparedness ITAAC notifications to NSIR for concurrence was reconsidered as a result of the ITAAC Demonstration Project. It was determined that this practice remains appropriate given the organizational responsibility of NSIR, and that no significant delays in processing are likely to occur as a result of this coordination.

NRO monitors performance via the ITAAC dashboards, as well as the oversight of the Vogtle Readiness Group, to ensure the identification and timely resolution of any associated issues with timely processing of the ITAAC notifications.

3.3 Notification Review

The *Lead Reviewer* shall complete in VOICES the applicable ITAAC Closure Verification Evaluation Form (VEF) or Uncompleted ITAAC Notification Checklist (UINC) [Appendices A2, A3, or A4] following the instructions on the form and the guidance below.

Reviewers should refer to RG 1.215 and the guidance, templates, and example ITAAC notifications provided in NEI 08-01, which together describe an acceptable approach for sufficiency of information and level of detail in ITAAC notifications. Some ITAAC notifications will be very similar to the examples in NEI 08-01, and the reviews of those ITAAC notifications should be rather straight forward. Other ITAAC notifications will be different from their associated examples in NEI 08-01, if their ITAAC are worded slightly differently or the actions taken to complete them are more involved. Verifying the completion of those ITAAC may not be as obvious to each reviewer.

An evaluation of the “sufficiency” of information in an ICN, IPCN, or UIN might involve the staff referring to information beyond what is documented in the NEI 08-01 examples. For instance, in order to ensure a reasonably complete understanding of the licensee’s basis for completing an ITAAC, the staff may need to consult the site-specific final safety analysis report, NRC safety evaluation report, or the referenced industry standards. For the review of a targeted ITAAC, inspection results in CIPIMS will also be used as another source to verify the licensee’s assertions in an ICN. However, the information in the licensee’s ITAAC notification should be the primary means of validating the licensee’s activities to complete an ITAAC and determining the acceptability of the ICN, IPCN, or UIN.

Reviewers should not attempt to independently verify whether the licensee adequately performed the ITAAC activities described in the ICN or IPCN, as this is an inspection function performed by NRC inspectors, but reviewers shall assess and verify whether the information provided in an ICN or IPCN supports the licensee's assertion that the ITAAC ITA was successfully completed and the AC are met. Each assigned reviewer must also understand that a "closure verification review" is not meant to be an in-depth "technical review" of all aspects of an ITAAC's implementation. Instead, the review centers on whether there is sufficient information for the NRC to understand and verify the licensee's basis for performing and successfully completing the ITAAC. In accordance with the 2012 final rule amending 10 CFR 52.99(c) (77 FR 51880, 51887; August 28, 2012), "The NRC would expect the notification to be sufficiently complete and detailed so that a reasonable person could understand the bases for the licensee's representation that the inspections, tests, and analyses have been successfully completed and the acceptance criteria are met."

NEI 08-01 further defines the term 'reasonable person' as an 'informed reader' who "is someone who is appropriately informed about and familiar with applicable NRC regulations, licensing requirements, and technical and/or engineering concepts related to ITAAC."

The 2012 final rule also provides that "the term 'sufficient information' would require, at a minimum, a summary description of the basis for the licensee's conclusion that" the ITA have been (or will be) performed, and that the prescribed acceptance criteria are (or will be) met. Just a simple statement that the ITA activities were performed, and that the AC of an ITAAC are met would not be sufficient. Thus, the licensee's "bases" should consist of a valid methodology to complete the ITAAC, as summarized in the licensee ITAAC notification (ICN, IPCN, or UIN), with emphasis on the most *important steps*. Background information for those important steps should address the *distinctive aspects* of an ITAAC in regard to its format, design constraints, and/or field conditions. Therefore, the "summary description" should address at a minimum: 1) the full scope of the ITAAC, 2) the licensee's methodology, and 3) an ITAAC's distinctive aspects.

Each reviewer of a licensee ITAAC notification must determine that the licensee showed that it performed (or will perform) the ITA and met (or will meet) the AC of an ITAAC by comparing the information in the ITAAC notification with the performance requirement(s) of the ITAAC. The ITA may require only one, or a combination of up to three different types of activities: 1) inspections, 2) tests, and 3) analyses. These activities, including other terms commonly used in the ITAAC, will be defined in the combined license. Each reviewer should be familiar with those definitions and understand what each one entails. The activities that a licensee performs as stated in a licensee ITAAC notification should agree with those definitions and should be those specified in the ITAAC. For example, if the ITA requires an inspection and an analysis, the reviewers shall verify that the licensee performed both as indicated in the ICN. Additional activities may be performed

and documented by the licensee; however, if the licensee implements fewer activities than required in the ITA, the reviewers shall not consider the ITAAC to be successfully performed by the licensee.

The AC state the expected outcome of the ITA. The AC may require a specific performance, physical condition, test, or analysis result for a structure, system, or component (SSC) in order to demonstrate that the design requirement stated in the design commitment is met. The reviewer will verify that the ITAAC notification demonstrates that the AC are (or will be) met and has sufficient detail to allow a reasonable person to understand the underlying bases for how the specific activities stated in the ITAAC notification verify that the expected outcome is achieved. As discussed in NEI 08-01, certain more complicated ITAAC may warrant additional details being provided in order to demonstrate that its AC are met. The licensee may provide intermediary steps that have their own results, and the reviewer should take into account the sum total of them before considering the AC as met.

An ITAAC notification will be deemed to have insufficient information when the NRC reviewer cannot determine that the ICN, IPCN, or UIN has sufficient information to demonstrate that the ITAAC has been successfully completed.

CIPIMS will provide inspection results for: (1) baseline (minimum planned) inspections of ITAAC documented in Region II inspection reports, (2) additional Region II inspections performed resulting from the NRC's assessments of a licensee's performance, and (3) all ITAAC findings identified during both Region II and vendor inspections. All vendor inspections are led by Headquarters staff. The *Lead Reviewer* shall verify for the specific ITAAC (a) each ICN (and possibly IPCN) lists all ITAAC findings as closed and (b) CIPIMS indicates all Region II inspections as completed and all ITAAC findings as closed.

If during the initial review of an ICN or IPCN, Region II has not indicated in CIPIMS that all Region II inspections for the ITAAC have been completed and that all ITAAC findings against the ITAAC have been closed, the *Lead Reviewer* shall complete his or her review of the ICN or IPCN and complete the VEF to the maximum extent possible. If an ICN or IPCN is deemed acceptable with the inspections for that ITAAC not totally completed and/or the ITAAC findings not closed, the *Lead Reviewer* shall complete the VEF and save it with the interim VEF status of "Review Complete." This allows VOICES to record the completion of the ITAAC review up to and through the Lead Reviewer awaiting the completion of ITAAC inspections and the closure of ITAAC findings. Once all ITAAC inspections by Region II have been completed and all ITAAC findings have been closed, the *Lead Reviewer* shall complete the review of the ICN or IPCN deemed previously acceptable, change the VEF's status to "Final," and save the VEF. If a VEF or UINC is ever only partially completed, the *Lead Reviewer* can select the VEF or UINC status of "Draft" and save it.

If the staff finds the content of an ICN or IPCN to be unacceptable, this will be communicated to the licensee regardless of the status of NRC inspections or ITAAC findings. The *Lead Reviewer* shall complete the VEF to obtain the correct status and follow the applicable steps for communicating the issue to the licensee (See Section 3.4 below).

Based on the answers provided by the Lead Reviewer on the VEF or UINC, VOICES will automatically assign one of the following interim review statuses which are “qualified” until final approval as indicated in Section 3.5:

For ICNs and IPCNs:

- Qualified Verified
- Qualified Insufficient Information

For UINs:

- Qualified Sufficient Information
- Qualified Review Suspended

3.4 Resolving Staff Concerns with the Notification

If the notification lacks sufficient information, the Lead Reviewer and/or *Technical Reviewer* will notify the *Lead Approver* and arrange a timely discussion such that all of the specific issues or concerns are clearly identified.

The *Lead Approver* shall timely review, and align with management on, a proposed path forward.

The *Lead Approver* will work with the licensing *PM* to inform the licensee that the NRC has concerns with the notification (i.e. ICN, IPCN, or UIN) and typically establish a date and time for a public conference call to discuss and attempt to resolve the NRC concerns. The timeframes for completing these activities should be commensurate with the timeliness goals for performance monitoring that have been established as a result of the ITAAC Demonstration Project Action Plan.

During this interim period, for ICNs and IPCNs, the *Lead Reviewer* shall manually change the review status in VOICES to “Under Disposition.”

Based on the outcome of the public conference call with the licensee, the *Lead Reviewer*, with the concurrence of the Technical Reviewer if applicable, shall complete the VEF. VOICES will change the notification’s status to one of the following interim

ones, with each status being qualified since it is awaiting full approval as indicated in Section 3.5.:

For ICNs and IPCNs:

- Qualified Verified
- Qualified Insufficient Information

For UINs:

- Qualified Sufficient Information
- Qualified Review Suspended

In those cases where the NRC staff and the licensee's staff cannot come to resolution on the issues raised by the *Lead Reviewer* and/or Technical Reviewer, the *PM* with assistance from the applicable NRC staff shall timely issue a formal Insufficient Information letter to the licensee describing the particular unresolved issue(s) and the NRC's rejection of the applicable ICN, IPCN, or UIN

3.5 **Final Approval**

The *Technical Approver* and *Technical Reviewer*, if assigned, shall acknowledge completion of their review and their concurrence by checking the boxes labeled "TA" and "TR" respectively on the bottom of the VEF form in VOICES.

The *Lead Approver* shall review the VEF or UINC and any comment entries for completeness and accuracy. The *Lead Approver* may override the closure review results and select a different outcome or may select the status "Minor Errors and Corrections" and return the notification to the *Lead Reviewer* to make the necessary changes and or corrections to the VEF or UINC. The *Lead Approver* shall finalize the status of the ITAAC notification by selecting one of the following in VOICES:

For ICNs and IPCNs:

- Verified
- Insufficient Information

For UINs:

- Sufficient Information
- Review Suspended

Following assignment of a final status by the *Lead Approver*, the *Lead Reviewer* shall take the necessary steps to enter the VEF or UINC into ADAMS.

3.6 Federal Register Notice

The *PM*, on a periodic basis, shall take the necessary steps to publish a *Federal Register* Notice (FRN) identifying the ICNs and IPCNs reviewed and accepted by the staff. VOICES will automatically generate a draft FRN, which will publicly announce the successful completion of an ITAAC. Appendix A1 is an example of an FRN for multiple ITAAC, which the licensing *PM* can modify to accommodate publishing the completion of single ITAAC. FRNs announcing the completion of multiple ITAAC will be published on a periodic frequency (e.g., monthly or quarterly) to promote organizational effectiveness. If the original FRN generated by VOICES needs corrections, the *PM* will have the capability in VOICES to make those corrections and generate a revised draft FRN. Changes to, or deviations from, an approved FRN template will necessitate a review by those internal organizations that reviewed the template.

After the licensing branch chief (BC) signs the FRN, it is sent to the Office of the *Federal Register* for publication consistent with 10 CFR 52.99(e)(1). The agency will not issue FRNs of the staff's determination of the successful completion of ITAAC after the last date for submission of requests for hearing in accordance with 10 CFR 52.103(a). However, the staff primarily responsible for ITAAC reviews will continue to announce on the NRC public Web site for "New Reactors" <https://www.nrc.gov/reactors/new-reactors/oversight/itaac.html> any determinations made after the deadline for hearing requests.

4.0 VERIFICATION OF ITAAC CLOSURE, EVALUATION, AND STATUS (VOICES)

An information technology system was developed to facilitate the ICVP workflow, called VOICES. That system is currently housed in Enterprise Project Management (EPM) to provide for a collaborative work environment and will interface with other existing systems, such as ADAMS and CIPIMS, as appropriate.

5.0 PERFORMANCE GOALS AND MEASURES

Dashboards within VOICES provide the management staff the capability to monitor the closure of ITAAC progress for a single unit or site. The dashboards provide information with respect to overall review timeliness, technical staff review timeliness, the status of ITAAC inspection completion or ITAAC closure reviews, the status for any given ITAAC notification, and when issues are being resolved with the licensees. A timeliness metric for review of the licensee's ITAAC notifications has been established at 60 days from the submittal of any ICN, IPCN, and or UIN to publication of the results of the NRC's review on the NRC's public Web site for ITAAC. The NRC staff has performance goals in place to complete the vast majority of these reviews in less than one month and will

routinely report out on its timely performance on the public ITAAC Web site. Management has the ability and will adjust the timeliness metric, as necessary, to support the schedule for making a timely 10 CFR 52.103(g) finding.

6.0 REFERENCES

1. *Atomic Energy Act of 1954, as amended, Section 185b.* (42 U.S.C. Section 2235(b)).
2. "Requirements for Maintenance of Inspections, Tests, Analyses, and Acceptance Criteria," *Federal Register*, Volume 77, pages 51,880 to 51,892, August 28, 2012.
3. NEI 08-01, Revision 5 - Corrected, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52." (ADAMS Accession No. ML14182A158)
4. RG 1.215, "Guidance for ITAAC Closure Under 10 CFR Part 52."
5. 10 CFR 2.340, Initial decision in certain contested proceedings; immediate effectiveness of initial decisions; issuance of authorizations, permits, and licenses.
6. 10 CFR 52.99, Inspection during construction; ITAAC schedules and notifications; NRC notices.
7. 10 CFR 52.103, Operation under a combined license.
8. SECY-10-0100, Enclosure 1, August 5, 2010, "Staff Progress in Resolving Issues Associated with Inspections, Tests, Analyses, and Acceptance Criteria."
9. Staff Requirements Memorandum (SRM) on SECY-13-033, "Allowing Interim Operation Under Title 10 of the *Code of Federal Regulations* Section 52.103" (April 4, 2013)

NRO-REG-103 - Change History			
Publication Date	Description of Changes	Method Used to Announce & Distribute	Training
11/13/2012	The purpose of this office instruction (OI) is to provide guidance for verifying the completion of inspections, tests, analyses, and acceptance criteria (ITAAC) in accordance with the requirements of Title 10 of the <i>Code of Federal Regulations</i> (10 CFR) Part 52, "Licenses, Certifications, and Approvals for Nuclear Power Plants."	Posting on NRO Web page	All staff (as requested)
4/27/2018	The purpose of this revision is to update the office instruction; to reflect implementation experience; to specifically refer to the Enterprise Project Management (EPM) application Verification of ITAAC Closure, Evaluation, and Status (VOICES) as the tool to facilitate the ITAAC Closure Verification Process (ICVP) instead of generically to EPM; to communicate changes to the ICVP, to revise the templates for the Verification Evaluation Form (VEF) and <i>Federal Register</i> Notice (FRN), to provide guidance for the review of Uncompleted ITAAC notification (UINs) and to better describe the review of ITAAC post-closure notification (IPCN, and to provide checklists in Appendices A3 and A4, for the reviews of UINs and IPCNs.	Posting on NRO Web page	All staff (as requested)

APPENDIX A1

Example of a *Federal Register* Notice: Announcing Closure of Inspections, Tests, Analyses and Acceptance Criteria (ITAAC)

[7590-01-P]

NUCLEAR REGULATORY COMMISSION

[Docket Nos. 52-025 and 52-026; NRC-2008-0252]

Southern Nuclear Operating Company, Inc.

Vogtle Electric Generating Plant, Units 3 and 4

Inspections, Tests, Analyses, and Acceptance Criteria

AGENCY: Nuclear Regulatory Commission.

ACTION: Determination of the successful completion of inspections, tests, and analyses.

SUMMARY: The U.S. Nuclear Regulatory Commission (NRC) staff has determined that the inspections, tests, and analyses have been successfully completed, and that the specified acceptance criteria are met for the Vogtle Electric Generating Plant (VEGP), Units 3 and 4.

APPENDIX A1

Example of a *Federal Register* Notice: Announcing Closure of Inspections, Tests, Analyses and Acceptance Criteria (ITAAC)

DATES: The determination of the successful completion of inspections, tests, and analyses for VEGP Units 3 and 4 is effective **[INSERT DATE OF PUBLICATION IN THE *FEDERAL REGISTER*]**.

ADDRESSES: Please refer to Docket ID **NRC-2008-0252** when contacting the NRC about the availability of information regarding this document. You may obtain publicly-available information related to this document using any of the following methods:

APPENDIX A1

Example of a *Federal Register* Notice: Announcing Closure of Inspections, Tests, Analyses and Acceptance Criteria (ITAAC)

- **Federal Rulemaking Web site:** Go to <http://www.regulations.gov> and search for Docket ID NRC-2008-0252. Address questions about NRC dockets to Jennifer Borges; telephone: 301-287-9127; e-mail: Jennifer.Borges@nrc.gov. For technical questions, contact the individual listed in the FOR FURTHER INFORMATION CONTACT section of this document.

- **NRC's Agencywide Documents Access and Management System (ADAMS):** You may obtain publicly available documents online in the ADAMS Public Documents collection at <http://www.nrc.gov/reading-rm/adams.html>. To begin the search, select "[ADAMS Public Documents](#)" and then select "[Begin Web-based ADAMS Search](#)." For problems with ADAMS, please contact the NRC's Public Document Room (PDR) reference staff at 1-800-397-4209, 301-415-4737, or by e-mail to pdr.resource@nrc.gov. The ADAMS accession number for each document referenced in this document (if that document is available in ADAMS) is provided the first time that a document is referenced.

- **NRC's PDR:** You may examine and purchase copies of public documents at the NRC's PDR, Room O1-F21, One White Flint North, 11555 Rockville Pike, Rockville, Maryland 20852.

FOR FURTHER INFORMATION CONTACT: Chandu Patel, Office of New Reactors, U.S.

Nuclear Regulatory Commission, Washington, DC 20555-0001; telephone: 301-415-3025; e-mail:

Chandu.Patel@nrc.gov.

APPENDIX A1

Example of a *Federal Register* Notice: Announcing Closure of Inspections, Tests, Analyses and Acceptance Criteria (ITAAC)

SUPPLEMENTARY INFORMATION:

I. Licensee Notification of Completion of ITAAC

Southern Nuclear Operating Company, Inc. (SNC), Georgia Power Company, Oglethorpe Power Corporation, MEAG Power SPVM, LLC., MEAG Power SPVJ, LLC., MEAG Power SPVP, LLC., and the City of Dalton, Georgia, (hereafter called the licensee) have submitted inspections, tests, analyses, and acceptance criteria (ITAAC) closure notifications (ICNs) under title 10 of the *Code of Federal Regulations* (10 CFR) 52.99(c)(1), informing the NRC that the licensee has successfully performed the required inspections, tests, and analyses, and that the acceptance criteria are met for:

VEGP Unit 3 ITAAC

2.1.01.07.i (8), 2.1.01.07.iv (11), 2.1.02.08d.vii (38), 2.5.02.07c (536), 3.1.00.05 (737), 3.7.00.01 (841), and E.3.9.05.01.01 (849)

VEGP Unit 4 ITAAC

2.1.01.07.i (8), 2.1.01.07.iv (11), 2.1.02.08d.vii (38), 2.5.02.07c (536), 3.1.00.05 (737), and 3.7.00.01 (841)

The ITAAC for VEGP Unit 3 are in Appendix C of the VEGP Unit 3 combined license

APPENDIX A1

Example of a *Federal Register* Notice: Announcing Closure of Inspections, Tests, Analyses and Acceptance Criteria (ITAAC)

(ADAMS Accession No. ML14100A106). The ITAAC for VEGP Unit 4 are in Appendix C of VEGP Unit 4 combined license (ADAMS Accession No. ML14100A135).

II. NRC Staff Determination of Completion of ITAAC

The NRC staff has determined that the specified inspections, tests, and analyses have been successfully completed, and that the specified acceptance criteria are met. The documentation of the NRC staff's determination is in the ITAAC Closure Verification Evaluation Form (VEF) for each ITAAC. The VEF is a form that represents the NRC staff's structured process for reviewing ICNs. Each ICN presents a narrative description of how the ITAAC was completed. The NRC's ICN review process involves a determination on whether, among other things: 1) each ICN provides sufficient information, including a summary of the methodology used to perform the ITAAC, to demonstrate that the inspections, tests, and analyses have been successfully completed; 2) each ICN provides sufficient information to demonstrate that the acceptance criteria of the ITAAC are met; and 3) any NRC inspections for the ITAAC have been completed and any ITAAC findings associated with that ITAAC have been closed.

The NRC staff's determination of the successful completion of these ITAAC is based on information available at this time and is subject to the licensee's ability to maintain the condition that the acceptance criteria are met. If the staff receives new information that suggests the staff's determination on any of these ITAAC is incorrect, then the staff will determine whether to reopen that ITAAC (including withdrawing the staff's determination on that ITAAC). The NRC staff's determination will be used to support a subsequent finding, pursuant to 10 CFR 52.103(g), at the

APPENDIX A1

Example of a *Federal Register* Notice: Announcing Closure of Inspections, Tests, Analyses and Acceptance Criteria (ITAAC)

end of construction that all acceptance criteria in the combined license are met. The ITAAC closure process is not finalized for these ITAAC until the NRC makes an affirmative finding under 10 CFR 52.103(g). Any future updates to the status of these ITAAC will be reflected on the NRC's Web site at <http://www.nrc.gov/reactors/new-reactors/oversight/itaac.html>.

This notice fulfills the staff's obligations under 10 CFR 52.99(e)(1) to publish a notice in the *Federal Register* of the NRC staff's determination of the successful completion of inspections, tests and analyses.

Vogtle Electric Generating Plant Unit 3, Docket No. 5200025

A complete list of the review status for VEGP Unit 3 ITAAC, including the submission date and ADAMS Accession Number for each ICN received, the ADAMS Accession Number for each VEF, and the ADAMS Accession Numbers for the inspection reports associated with these specific ITAAC, can be found on the NRC's Web site at <http://www.nrc.gov/reactors/new-reactors/new-licensing-files/vog3-icnsr.pdf>.

Vogtle Electric Generating Plant Unit 4, Docket No. 5200026

A complete list of the review status for VEGP Unit 4 ITAAC, including the submission date and ADAMS Accession Number for each ICN received, the ADAMS Accession Number for each VEF, and the ADAMS Accession Numbers for the inspection reports associated with these specific ITAAC, can be found on the NRC's Web site at <http://www.nrc.gov/reactors/new->

APPENDIX A1

Example of a *Federal Register* Notice: Announcing Closure of Inspections, Tests, Analyses and Acceptance Criteria (ITAAC)

[reactors/new-licensing-files/vog4-icnsr.pdf](#)

Dated at Rockville, Maryland, this 7th day of February, 2018.

For the Nuclear Regulatory Commission.

/RA/

Jennifer L. Dixon-Herrity, Chief,
Licensing Branch 4,
Division of New Reactor Licensing,
Office of New Reactors.

APPENDIX A2

Inspections, Tests, Analyses and Acceptance Criteria (ITAAC)
Closure Verification Evaluation Form (VEF) for an ITAAC Closure
Notification (ICN)

The Lead Reviewer in concert with other reviewer(s) assigned to an ITAAC closure review will complete this form for the ITAAC under review.

Docket No. _____

Licensee Name _____ Plant Name _____

Unit Number _____ Combined License No. _____

ITAAC Closure Notification (ICN) ADAMS ML No. _____

ITAAC ID No. _____ Targeted _____ Non-Targeted _____

ITAAC Family Designation or enter N/A _____

Name of Lead Reviewer _____

Name of Technical Reviewer assigned to ITAAC Closure Review based on an affirmative response to statement "j" below:

Technical Reviewer

Organization

Enter "Yes" in the blank at the beginning of a statement below if the whole statement is true, "No" if the whole or part of the statement is not true and "N/A" if the statement is not applicable.

- a. _____ The ICN identifies all of the following: (1) licensee, (2) plant site name, (3) unit number and (4) plant's docket number.
- b. _____ The ITAAC as stated in the ICN matches the ITAAC as stated in the combined license.
- c. _____ NRC personnel with the requisite technical and engineering knowledge has/have determined that the ITAAC Determination Basis (IDB) of the ICN contains sufficient information including a summary of the methodology for performing the ITAAC, to demonstrate that the licensee has successfully performed the inspection, test, and/or analysis stated in the ITAAC. The methodology described in the IDB of the ICN either was reviewed and approved by the NRC or is acceptable based on sound scientific, mathematical, and/or engineering principles, and is repeatable, if necessary, without any significant change to the reported result.
- d. _____ NRC personnel with the requisite technical and engineering knowledge has/have determined that the IDB of the ICN contains sufficient information to demonstrate that the licensee has fully met the entire acceptance criterion stated in the ITAAC

APPENDIX A2

Inspections, Tests, Analyses and Acceptance Criteria (ITAAC)
Closure Verification Evaluation Form (VEF) for an ITAAC Closure
Notification (ICN)

- e. _____ For ITAAC specified as being performed on “as-built” structures, systems, or components (SSCs): If the licensee performed the inspections, tests, and/or analyses of the ITAAC at location(s) other than the final installed location, the licensee has based on the guidance in NEI 08-01 either summarized a technical justification or provided a reference to a generic technical justification in the IDB of the ICN that establishes why it was acceptable to perform the ITAAC at location(s) other than the final installed location. [Enter N/A if the ITAAC was not performed at a remote location or if the ITAAC is not specified as “as-built.”]
- f. _____ If ITAAC is a “Reference ITAAC,” all the ITAAC it references have been verified as successfully completed. (Enter “N/A” if ITAAC is not a reference ITAAC.)
- g. _____ All planned inspections for this ITAAC (if any) have been completed as indicated in the Construction Inspection Program Management System (CIPIMS). Either NRC inspectors found no ITAAC findings for this ITAAC or any ITAAC findings are closed as indicated in CIPIMS and the ICN for this ITAAC.
- h. _____ The ICN indicates that the licensee completed the ITAAC as affirmed by the signature of a licensee representative.
- i. _____ During concurrence review, a potential problem was identified which prevents verifying the completion of the ITAAC
- j. _____ An additional reviewer was assigned to the ITAAC closure review with his or her name entered into the blank at the top of this page based on his or her expertise being required.

If the reviewers have verified that the licensee successfully completed the inspections, tests, and analyses prescribed for this ITAAC, and that the acceptance criteria have been met then this determination is based on information available at the time and is subject to the licensee’s ability to maintain the condition that the acceptance criteria are met. If the staff receives new information suggesting that the staff’s determination on this ITAAC is incorrect, then the staff will determine whether this ITAAC should be reopened by the licensee. An affirmative NRC staff determination on this ITAAC will be used to support a subsequent finding, pursuant to 10 CFR 52.103(g), at the end of construction that all acceptance criteria in the combined license are met. The ITAAC closure verification process is not finalized for this ITAAC until the NRC makes an affirmative finding under 10 CFR 52.103(g).

Lead Reviewer _____ Date _____

Lead Approver _____ Date _____

Licensing PM _____

APPENDIX A2

Inspections, Tests, Analyses and Acceptance Criteria (ITAAC)
Closure Verification Evaluation Form (VEF) for an ITAAC Closure
Notification (ICN)

If no Technical Reviewer was assigned to the ITAAC Closure Review, enter "N/A" below.

Technical Reviewer _____ Date _____

Technical Approver _____ Date _____

APPENDIX A3

Uncompleted Inspections, Tests, Analyses, and Acceptance
Criteria (ITAAC) Notification Checklist (UINC)

A Lead Reviewer in concert with other reviewer(s) assigned to an uncompleted ITAAC notification (UIN) review will complete this form for the ITAAC under review.

Docket No. _____ Plant Name _____
Licensee Name _____ Combined License No. _____
Uncompleted ITAAC Notification (UIN) ADAMS ML No. _____
ITAAC ID No. _____ Targeted _____ Non-Targeted _____
ITAAC Family Designation or enter N/A _____
Name of Lead Reviewer _____

Name of Technical Reviewer assigned to UIN Review based on an affirmative response to statement "f" below:

_____ Organization
Technical Reviewer

Enter "Yes" in the blank at the beginning of a statement below if the whole statement is true, "No" if the whole or part of the statement is not true and "N/A if the statement is not applicable.

- a. _____ The UIN identifies all of the following: (1) licensee, (2) plant site name, (3) unit number, and (4) plant's docket number.
- b. _____ The ITAAC as stated in the UIN matches the ITAAC as stated in the combined license.
- c. _____ NRC personnel with the requisite technical and engineering knowledge has/have determined that the ITAAC Completion Description (ICD) of the UIN contains sufficient information, including summarizing the methodology for performing the ITAAC, to demonstrate that the licensee will successfully perform the inspection, test, and/or analysis stated in the ITAAC if the licensee uses the methodology described in the UIN. The methodology described in the ICD of the UIN either was reviewed and approved by the NRC or is acceptable based on sound scientific, mathematical, and/or engineering principles, and is repeatable, if necessary, without any significant change to the reported result.
- d. _____ NRC personnel with the requisite technical and engineering knowledge has/have determined that the ICD of the UIN contains sufficient information to demonstrate that the licensee will be able to show that it has fully met the entire acceptance criterion stated in the ITAAC if it performs the ITAAC as stated in the UIN.
- e. _____ For ITAAC specified as being performed on "as-built" structures, systems, or components (SSCs): If the UIN indicates that the inspections, tests, and/or analyses of the ITAAC are being performed at location(s) other than the final installed location, then the UIN, based on the guidance in NEI 08-01 either summarizes a technical justification or provides a reference to a generic technical justification in the ICD of the UIN that establishes why it is acceptable to perform the ITAAC at location(s) other than the final installed location. [Enter N/A if the

APPENDIX A3

Uncompleted Inspections, Tests, Analyses, and Acceptance
Criteria (ITAAC) Notification Checklist (UINC)

ITAAC is not being performed at a remote location or if the ITAAC is not specified as "as-built."]

- f. _____ An additional reviewer was assigned to the UIN review with his or her name entered into the blank at the top of this page based on his or her expertise being required.

If the NRC reviewers determine that a UIN has sufficient information, this is based on the UIN's description of the proposed methodology for completing the ITAAC. The UIN review is not based on consideration of actual performance of the ITAAC, the acceptance criteria results, the completion of NRC inspections, or the resolution of NRC inspection findings, if any. These matters will be addressed during the NRC's review of the later ITAAC closure notification (ICN) for that ITAAC. The NRC staff plans to rely on a UIN review in its review of the later ICN to the extent that the ITAAC completion methods described in the UIN and ICN are the same, subject to new information that might arise between the UIN and ICN reviews.

Lead Reviewer _____ Date _____

Lead Approver _____ Date _____

Licensing PM _____

If no Technical Reviewer was assigned to the UIN Review, enter "N/A" below.

Technical Reviewer _____ Date _____

Technical Approver _____ Date _____

APPENDIX A4

Inspections, Tests, Analyses, and Acceptance Criteria
(ITAAC) Closure Verification Evaluation Form (VEF)
for a ITAAC Post-Closure Notification (IPCN)

A Lead Reviewer in concert with other reviewer(s) assigned to an ITAAC closure review will complete this form for the ITAAC under review.

Docket No. _____

Licensee Name _____ Plant Name _____

Unit Number _____ Combined License No. _____

ITAAC Post-Closure Notification (IPCN) ADAMS ML No. _____

ITAAC ID No. _____ Targeted _____ Non-Targeted _____

ITAAC Family Designation or enter N/A _____

Name of Lead Reviewer _____

Name of Technical Reviewer assigned to IPCN Review based on an affirmative response to statement "j" below:

Technical Reviewer

Organization

Enter "Yes" in the blank at the beginning of a statement below if the whole statement is true, "No" if the whole or part of the statement is not true and "N/A if the statement is not applicable.

- a. _____ The IPCN identifies all of the following: (1) licensee, (2) plant site name, (3) unit number and (4) plant's docket number.
- b. _____ The ITAAC as stated in the IPCN matches the version of the ITAAC in the combined license.
- c. _____ NRC personnel with the requisite technical and engineering knowledge has/have determined that the ITAAC Determination Basis (IDB) of the IPCN, in combination with its associated ICN of record, contains sufficient information including a summary of the methodology for performing the ITAAC to demonstrate that the licensee has successfully performed the inspection, test, and/or analysis stated in the ITAAC. The methodology described in the IDB of the IPCN either was reviewed and approved by the NRC or is acceptable based on sound scientific, mathematical, and/or engineering principles, and is repeatable, if necessary, without any significant change to the reported result.
- d. _____ NRC personnel with the requisite technical and engineering knowledge has/have determined that the IDB of the IPCN, in combination with its associated ICN of record, contains sufficient information to demonstrate that the licensee has fully met the entire acceptance criterion stated in the ITAAC.

APPENDIX A4

Inspections, Tests, Analyses, and Acceptance Criteria
(ITAAC) Closure Verification Evaluation Form (VEF)
for a ITAAC Post-Closure Notification (IPCN)

- e. _____ For ITAAC specified as being re-performed on “as-built” structures, systems, or components (SSCs): If the licensee performed the inspections, tests, and/or analyses of the ITAAC at locations other than the final installed location, the licensee has based on the guidance in NEI 08-01 either summarized a technical justification or provided a reference to a generic technical justification in the IDB of the IPCN that establishes why it was acceptable to perform the ITAAC at location(s) other than the final installed location. [Enter N/A if the ITAAC was not re-performed at a remote location or if the ITAAC is not specified as “as-built.”]
- f. _____ If ITAAC is a “Reference ITAAC,” all the ITAAC it references have been verified as successfully completed. (Enter “N/A” if ITAAC is not a reference ITAAC.)
- g. _____ All planned inspections for this ITAAC (if any) have been completed as indicated in the Construction Inspection Program Management System (CIPIMS). Either NRC inspectors found no ITAAC findings for this ITAAC or any ITAAC findings are closed as indicated in CIPIMS and the IPCN for this ITAAC.
- h. _____ The IPCN indicates the licensee has completed the ITAAC notwithstanding the new information giving rise to the IPCN, as affirmed by signature of a licensee representative.
- i. _____ During concurrence review, a potential problem was identified which prevents verifying the completion of the ITAAC.
- j. _____ An additional reviewer was assigned to the ITAAC closure review with his or her name entered into the blanks at the top of this page based on his or her expertise being required.

If the reviewers have verified that the licensee successfully completed the inspections, tests, and analyses prescribed for this ITAAC, and that the acceptance criteria have been met, then this determination is based on information available at the time and is subject to the licensee’s ability to maintain the condition that the acceptance criteria are met. If the staff receives new information suggesting that the staff’s determination on this ITAAC is incorrect, then the staff will determine whether to reopen this ITAAC. A positive NRC staff determination on this ITAAC will be used to support a subsequent finding, pursuant to 10 CFR 52.103(g), at the end of construction that all acceptance criteria in the combined license are met. The ITAAC closure verification process is not finalized for this ITAAC until the NRC makes an affirmative finding under 10 CFR 52.103(g).

Lead Reviewer _____

Date _____

Lead Approver _____

Date _____

Licensing PM _____

APPENDIX A4

Inspections, Tests, Analyses, and Acceptance Criteria
(ITAAC) Closure Verification Evaluation Form (VEF)
for a ITAAC Post-Closure Notification (IPCN)

If no Technical Reviewer was assigned to the IPCN Review, enter "N/A" below.

Technical Reviewer _____ Date _____

Technical Approver _____ Date _____

APPENDIX A5

ITAAC Lead Reviewer Training and Qualification

The purpose of this training is to familiarize the Lead Reviewer trainee with the review structure and procedures for how the Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Closure Verification Process (ICVP) is implemented for review and acceptance of the ITAAC notifications received in accordance with 10 CFR 52.99. Technical staff who participate in the ITAAC closure review process as a subject matter expert are not required to be qualified as a Lead Reviewer to this level of training. A subject matter expert need only be familiar with how to interface with VOICES. The ITAAC group continuously monitors and forecasts the expected workload for ITAAC notification reviews particularly in preparation for the ITAAC surge. Should projections indicate the need for additional reviewers, this training will be utilized to train additional reviewers. One of the goals of this training is to promote consistency across reviewers. The training materials, references, and online course provide the general level of detail to be expected from information included in ITAAC notifications.

Level of Effort: (Complete within 3 to 4 months)

- 4 hours of self-study, including guidance review, iLearn course completion, and participation in two instructor-led group sessions
- Review examples of completed ICNs
- Interview with HOIB BC or representative
- Complete first ICN review in a training status under a current HOIB ITAAC reviewer

Maintaining Proficiency:

- Complete review of at least one ICN per 6 months to maintain proficiency. Lead Reviewer qualifications should be tracked by the organization responsible for the ICVP.

The subject matter for training as a Lead ITAAC reviewer is the following:

Self-Study:

Read the following two guides on ITAAC Closure:

1. Regulatory Guide (RG) 1.215, "Guidance for ITAAC Closure Under 10 CFR Part 52," Revision 2 (ADAMS Accession No. ML15105A447).
2. Nuclear Energy Institute (NEI) 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52," Revision 5–Corrected (ADAMS Accession No. ML14182A158).

Online course:

iLearn Course ID 155144, "Introduction to Inspections, Tests, Analyses, and Acceptance Criteria" (ITAAC) (Web-Based)

ITAAC Lead Reviewer Training and Qualification

- a) Module 1 – Intro to course
- b) Module 2 – Intro to ITAAC
- c) Module 3 – Assess ITAAC Value of Inspection
- d) Module 4 – ICVP
- e) Module 5 – Course recap

Instructor-led training

Session 1

1. Understanding what ITAAC are and their purpose:
 - a. Overall purpose of ITAAC
 - b. Three basic types of ITAAC and also the two classifications of ITAAC for inspection
 - c. How ITAAC are completed, by whom, and where
2. Understanding the ITAAC Closure Verification Process (ICVP):
 - a. Types of notifications the NRC may receive in accordance with 10 CFR 52.99
 - b. ICVP, based on its fundamentals and regulatory basis
 - c. Concept of sufficiency of information in an ICN, IPCN, or UIN
 - d. Purpose of the templates and example ITAAC notifications in NEI 08-01
 - e. How the review of uncompleted ITAAC notifications affects the review of ICNs
 - f. ITAAC findings and their effects on the ICVP
 - g. How the NRC interacts with a licensee for clarification, insufficient information, or a potential problem in a notification on ITAAC
3. Understand how an ITAAC is inspected:
 - a. Role of Region II in the inspection of ITAAC and the purpose of those inspections
 - b. Role of the vendor inspection branches in the inspection of ITAAC
 - c. What is meant by the completion of all inspections for an ITAAC
 - d. When there is an ITAAC finding against an ITAAC

Session 2

1. Understand what VOICES is and its purpose:
 - a. Understanding of the primary roles in VOICES
 - b. Comprehending the various statuses of the ITAAC notification for a given ITAAC under review and how the preliminary and final results for a notification review are achieved
 - d. Understanding the information available in VOICES
 - f. Verifying completion of inspections for a given ITAAC and the closure of relevant ITAAC findings
 - g. Understanding the purpose of the ITAAC Closure Verification Evaluation Form (VEF) and the Uncompleted ITAAC Notification Checklist (UINC)
 - j. Understanding how each person involved in an ITAAC closure review is notified for review
 - k. Comprehending whether all required communications during an ITAAC closure

APPENDIX A5

ITAAC Lead Reviewer Training and Qualification

review are controlled by VOICES or rather there are communications external to VOICES necessary for completion of that review