

ITAAC Closure Verification Process (ICVP)

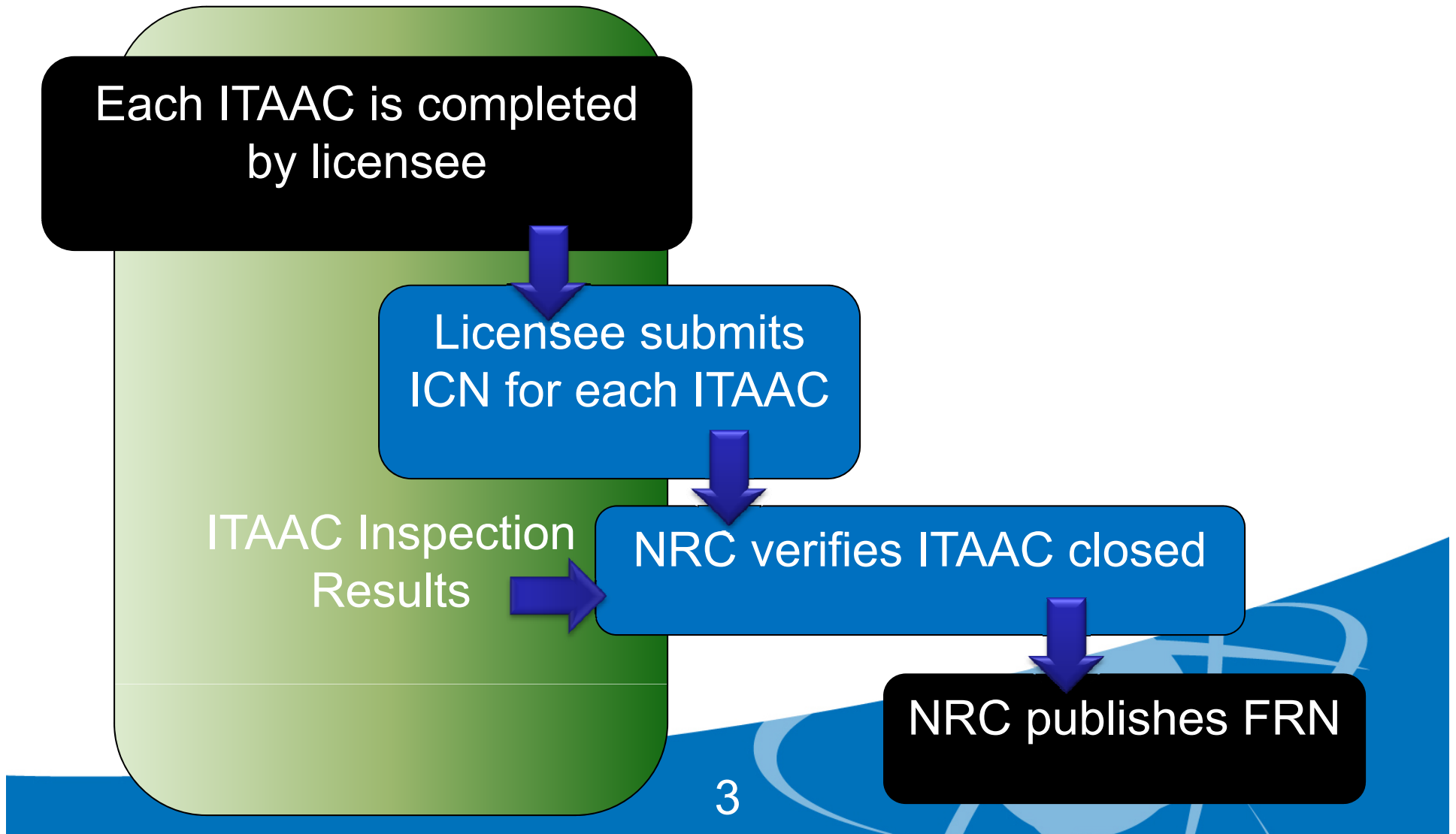
February 07, 2013

ITAAC Closure Notifications (ICNs)



- Required under 10 CFR 52.99
- Submitted by the licensee for both staff use and public information
- Licensees have processes, templates and examples contained in industry guidance NEI 08-01
- NEI 08-01 endorsed through Regulatory Guide 1.215

ITAAC Closure Verification Process



ITAAC Closure Verification Process

- Led by NRO/DCIP
- 100% of ICNs reviewed
 - **Thorough review but not a technical review**
 - **Input as needed from technical experts and field Inspectors**
- NRC inspections completed prior to reviewing the ICNs
- Closure strategy requires 50% of the targeted ITAAC in a Family be closed prior to closing any non-targeted ITAAC in the family.

History/Background



- ICVP developed over last 4 years.
- Office Instruction --NRO – REG – 103 developed with input from stakeholders (DNRL, Region II, OGC, and NSIR)

Closure Review Sequence



- An ICN is received by Document Processing Center and entered into ADAMS
- DNRL PM initiates the ICVP by changing status of NEW ICN record in VOICES as ready for review and assigning a DCIP BC as the lead approver
- DCIP BC assigns an ITAAC Engineer
 - **The ITAAC Engineer reviews the ICN in accordance with the ITAAC Verification Evaluation Form (the VEF).**
 - **The ITAAC Engineer determines if an ICN has sufficient information**
 - **Entire scope of an ITAAC addressed including unique aspects**
 - **Important steps of licensee's methodology provided**
 - **ICN confirmed by CIPIMS inspection results**

Closure Review Sequence (cont)



- ITAAC Engineer completes VEF in VOICES
- VOICES automatically establishes one of three statuses based on results of the review
- DCIP BC concurs on results of ICN review



Outcomes of concurrence review

- ICN has insufficient information
- A potential material concern is identified
- ITAAC verified successfully completed

Insufficient Information

- DNRL PM will notify the licensee by a letter
- Licensee will submit a new ICN of record that addresses deficiencies in original ICN
- The ICVP will be initiated for the new ICN

Potential Material Concern



- Potential material concern is an issue that could be material to meeting the acceptance criteria of an ITAAC



Material Concern (cont)

- If concern is not legitimate, ICN review will continue as planned
- For a legitimate material concern, the DNRL PM will notify the licensee by letter of the concern. The concern could be incorrect standard used for a calculation, improper welds in the field, or test for flow rate was not met due to flow rate being less than required
- Licensee responds to concern

Material Concern (cont)



- Region II may perform inspections and may confirm an ITAAC Finding
- For an ITAAC Finding, the licensee performs corrective actions and submits a new ICN of record
- ICVP initiated for the new ICN and original ICN is superseded
- If Region II determines there is no ITAAC finding, ICN is treated as having insufficient information to properly address the concern



ITAAC Verified Successfully Completed



- In VOICES two possible outcomes – unconditionally verified as completed and conditionally verified as completed
- Unconditionally verified as completed:
 - NRC website and VOICES are updated to reflect completion of an ITAAC
 - A draft FRN is generated by VOICES for multiple ITAAC on a monthly or quarterly basis to promote increased efficiency
 - Successful completions of multiple ITAAC are published in *Federal Register*

ITAAC Verified Successfully Completed (cont)



- Conditionally verified as completed:
 - NRC website and VOICES status are updated
 - ITAAC remains in this status until 50% of targeted ITAAC in its family are completed
 - Once that threshold is met, VOICES changes the status of ITAAC to unconditionally verified as completed



Next Steps

- First ICN for Vogtle Unit 3 was processed by the ICVP in January of 2013
- Continued enhancements of ICVP to make it more efficient for processing of ICNs in the future

Acronyms



- ADAMS - Agencywide Documents Access & Management System
- BC – Branch Chief
- CIPIMS – Construction Inspection Program Information Management System
- DNRL – Division of New Reactor Licensing
- FRN – Federal Register Notice
- ICN – ITAAC Closure Notification
- ICVP – ITAAC Closure Verification Process
- IPCN – ITAAC Post Closure Notification
- NRO – Office of New Reactors
- NSIR - Office of Nuclear Security and Incident Response
- OGC – Office of General Counsel
- VEF – ITAAC Closure Verification Evaluation Form
- VOICES – Verification of ITAAC Closure, Evaluation, and Status

