

Staff Comment #	Comment
2.0	Page.4, 2 <sup>nd</sup> paragraph starting “(NDEs). The terms, inspect...”:.. should be part of the paragraph above.
2.1	Page. 4, last paragraph: What is the purpose of the parenthetical remark (also known as...)?
3.0	Page 6, 1 <sup>st</sup> paragraph: Revise “Initial Test Program” to “Inspections, Tests, Analyses, and Acceptance Criteria”.
3.1	Page. 7, 1 <sup>st</sup> paragraph: Sentence which starts “EDV may be conducted...”, revise “COL phase” to “COL application phase”. Last sentence revise “ITAAC verification” to “ITAAC closure verification”.
3.2	Page 7, 3 <sup>rd</sup> paragraph: 1 <sup>st</sup> line and 4 <sup>th</sup> from the bottom, revise “NRC” to “the NRC”.
3.3	Page 9, 1 <sup>st</sup> paragraph under 3.1.3: Revise 3 <sup>rd</sup> sentence as follows:  For plants licensed under Part 52, the inspection targets for the NRC’s baseline inspection program will be selected based on a process that identifies those ITAAC having a higher inspection value.
3.4	Page 10, 2 <sup>nd</sup> paragraph: Delete “a record review of the”.
3.5	Page 10, last paragraph: In the second line, revise “any” to “all planned inspections for the given ITAAC were completed and that any”.
3.6	Page 11, top lines: Revise “specific inspections.” to “specific inspections related to its contents.”
3.7	Page 11, 1 <sup>st</sup> paragraph: Revise paragraph to read:  The NRC may, if necessary, delay its closure determination for a non-targeted ITAAC until at least some target ITAAC inspections have been completed in a particular ITAAC family to confirm that the licensee’s performance within that ITAAC family is satisfactory.
3.8	Page 11, 3 <sup>rd</sup> full paragraph: In last sentence, revise “Findings” to “Findings if verified by subsequent NRC inspections.”
3.9	Page 11, last paragraph of 3.1.4: Revise the following sentence as follows:  In accordance with Section 52.99(c)(2), ITAAC post-closure notifications are submitted when the licensee identifies new information that materially alters the bases for determining that ITAAC were performed as required or that the acceptance criteria are met.
3.10	Page 13, 1 <sup>st</sup> paragraph under (c)(4): Sufficient publically available information should be available, however some ICNs only reference non-public documents or need to discuss content of the non-public documents.
3.11	Page 13, last paragraph: Revise “supplemental notifications” to ITAAC post-closure notifications”.
3.12	Page 14, next to last paragraph: Where is the following interpretation of what the rule means stated or addressed?  Licensees should seek to provide the appropriate level of detail for “completeness,” without including extraneous information that might create confusion or expand the scope of issues inappropriately. In the case of ITAAC closure notifications, reliance on routine programs (e.g., quality assurance program, corrective action program) to provide assurance that the ITAAC are

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	completed successfully should be expected. Information on these programs is not required in this context unless a program inadequacy calls into question the successful completion of ITAAC.
3.13	Page 21, paragraph above 4: 3 <sup>rd</sup> line should have "See 10 CFR 2.340(c)." or something to tie to sentence before.
5.0	Page 24, first bullet under 5.1.2: Prerequisites to these activities are that construction be completed to the extent that the ITAAC may be performed.
5.1	Page 24, 1 <sup>st</sup> paragraph under 5.1.3: Comment to 1 <sup>st</sup> sentence – If the possibility exists that there will not be an ITAAC Completion Plan, will there always be an ITAAC Completion Package?
5.2	Page 26, number 4: Revise "regarding" to "indicating".
5.3	Page 26, number 5: Revise bracketed information to "which should be complete/closed if the item is material to completion of the ITAAC".
5.4	Page 26, number 6: Comment – What about the list of references and their appropriate sections or articles for instance the ASME Code?
5.5	Page 26, paragraph above 5.3: Comment – It would seem that the format of ITAAC Completion Packages are sufficiently high level to be able to envelope all ITAAC. If not, please state here what sections of it would possibly change and why.
6.0	<p>Page 27, 1<sup>st</sup> full paragraph: In the first sentence, revise "and/ key steps" to "including all key steps, and the entire scope of the ITAAC including its unique aspects"</p> <p>In last sentence, comment, if there is a paring away of the difference between ICNs and UINs, it would seem that the higher standard for UINs should be invoked.</p>
6.1	Page 27, 2 <sup>nd</sup> full paragraph: Global comment, more explanation on writing determination basis still needed.
6.2	Page 27, last full paragraph: In the bracketed information, revise "wording" to "wording and unique aspects".
6.3	Page 27, last bullet: Revise "and/or key steps" to "including key steps, and the entire scope of the ITAAC including its unique aspects". Also revise "ITA description" to ITAAC Determination Basis".
6.4	Page 28, 2 <sup>nd</sup> bullet: Revise "closed" to "complete with the signature of someone with the authority to make this statement for the licensee".
6.5	Page 28, 1 <sup>st</sup> paragraph: In last sentence, revise to put "in" before "Section 8.1".
6.6	Page 28, 3 <sup>rd</sup> paragraph which starts "Licensees...": After NRC add "The notifications will be attachments to a single transmittal letter".
6.7	<p>Page 28, last paragraph: In the first sentence add "or an ITAAC can be partitioned into distinct parts" before "for". After this sentence add "Generally for most certified designs, distinct, individual acceptance criteria will be treated by the NRC as individual ITAAC".</p> <p>Revise the following sentence:</p> <p>A partial ITAAC closure notification should clearly state that it is only "a partial ICN" in a watermark or equivalent on each of its pages.</p>

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7.0	Page 29, 1 <sup>st</sup> paragraph: In 2 <sup>nd</sup> sentence, delete “wish to”.
7.1	Page 29, 2 <sup>nd</sup> paragraph: The 2 <sup>nd</sup> sentence seems indicate that the ICNs and UINS are treated similarly.
7.2	<p>Page 29, 3<sup>rd</sup> paragraph: Revise the following sentences as follows</p> <p>As a result of these discussions, NEI 08-01 calls for ICNs to summarize the purpose and entire scope and unique aspects of the ITAAC with respect to demonstrating the Design Commitment, the methodology and all key steps for conducting the ITA, and the results that demonstrate that the acceptance criteria are met. The ICN template in Appendix D-1 specifically calls for licensees to describe the methodology including all key steps and the entire scope of the ITAAC and its unique aspects used in performing the ITA and demonstrating that acceptance criteria are met, and the examples presented in Appendix D were developed with this standard as a guideline. Thus, ITAAC notifications based on NEI 08-01 guidance, including description of methodology, including all key steps, and the entire scope of the ITAAC and its unique aspects for performing the ITA and determining that the AC are met, will meet both the 52.99(c)(1) standard for ICNs), and the differing standard for c(3) uncompleted (UIN).</p>
7.3	Page 30, 4 <sup>th</sup> paragraph: The staff had requested that two sentences be deleted, however, the use of the word “prospectively“ has raised the issue of present vs. future tense for the UIN. The staff and industry continue to discuss the proper tense.
8.0	<p>Page 32, above 8.1: Add the following:</p> <p>If during maintenance of an ITAAC, it is discovered that the wording of an ITAAC should be altered effectively making the ITAAC a new ITAAC, the NRC would expect an ICN under 52.99(c)(1) to be submitted to the NRC to verify completion of that ITAAC. Since modifying the ITAAC would be a change to the COL, this change would have to be processed as a license amendment.</p>
8.1	Page 33, paragraph above 8.2: Comment – ITAAC are only in effect until fuel load so this should be taken into account.
8.2	Page 34, 2 <sup>nd</sup> paragraph: Based on discussions between the NRC and industry, would like to ensure consistency and therefore further discussion is necessary.
8.3	Page 34, paragraph above ITAAC Post-Closure Notification Thresholds: Revise “supplemental post-closure ITAAC” to “ITAAC post-closure”.
8.4	<p>Page 34, under 1. Material Error or Omission:</p> <p>1<sup>st</sup> paragraph - Revise “a corrected ITAAC Closure Notification” to “ITAAC Post-Closure Notification”.</p> <p>2<sup>nd</sup> paragraph – Revise “a corrected ITAAC Closure Notification” to “an ITAAC Post-Closure Notification”.</p> <p>In the next sentence – what is a “separate notification” and what is it called?</p>
9.0	Page 38, last paragraph of 9.1: 2 <sup>nd</sup> sentence comment, typically the ITAAC itself would not do this, but the ICN should address this.
9.1	Page 39, section 9.5 last paragraph. Comment, in Revision 4 section 8.5.5, 4 <sup>th</sup> paragraph, it stated, “This document should provide the basis for performing the inspection in a manner different than normal industry practice.” This does not appear anywhere in Revision 5.

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9.2	Pg. 40, 2 <sup>nd</sup> paragraph, 2 <sup>nd</sup> line: delete "other than those described above". The licensee should identify all ITAAC to be performed at the vendor facility to support NRC vendor inspection planning. In addition, when the 8.5.5, 4 <sup>th</sup> paragraph in Revision 4 was moved to Section 9.7, the concept of documenting the basis for performing the inspection in a manner different than normal industry practice appears to have been removed.
10.0	Pg. 43, last paragraph: revise "within-scope SSCs" to read "SSCs within scope of the RAP (RAP SSCs)". On page 44, 2 <sup>nd</sup> paragraph under 10.4.1, revise "SSCs within scope of the RAP (RAP SSCs)" to read "RAP SSCs".
10.1	Page 44, 4 <sup>th</sup> paragraph under 10.4.1, next to last line: Revise so that the D- and RAP are on the same line.
10.2	Page 46, 2 <sup>nd</sup> paragraph: What if the design description itself does not provide an adequate description?
10.3	Page 47, 1 <sup>st</sup> paragraph, last sentence: Delete "it" before "there".
A.0	Page A-2, last paragraph above 10 CFR 52.103: Extra period at end of paragraph.
D.0	Example D-100, in previous comments, the staff indicated that the ICN should either state that a report exists meeting the requirements or that if the requirement is not met that there is insufficient flow to transport the chaulking. Further discussion is still needed on this.
H.0	Page H-5 and H-6, Example 3: As in Example 2, after module replacement should not post work testing be the basis for not having to submit a supplemental closure notification. The first sentence is outdated since the NRC is deleting the functional arrangement ITAAC from future DC for I&C components however it probably still exists for the AP-1000.