

# Overview of Proposed NEI 08-01 Updates Based on April 10<sup>th</sup> ICN “Level of Detail” Discussions

NEI/Industry

# Guidance Clarifications

- Appendix D-1 ICN Template:
  - “For those ITAAC where the acceptance criteria contains a numerical value(s), the IDB should provide the numerical results (or a range of results) of the inspections, tests, or analysis in order to provide a direct comparison and conclusion that the acceptance criteria are met”
  - “When an industry code or standard is utilized in the performance of an ITAAC, it should be referenced with as much specificity as practical.”  
[NRC Comment 5.4]

# ITAAC Maintenance Clarification

- Section 8.2: “Alternatively, if a licensee activity re-performs an ITAAC and the numerical result differs from that provided in the ICN, as long as the Acceptance Criteria continue to be met and none of the notification thresholds are exceeded, no Post-Closure Notification is required”
- Addition of new Appendix H Example 5.8 (next slide)

# Proposed App H Example 5.8

## AP1000 ITAAC 2.3.07.08.ii

- ITAAC statement (not included) is for a pump flow rate test.
- The ITAAC Closure Notification has been submitted. Subsequently, the licensee performs additional preoperational testing on the SFS. The additional testing was performed in the same configuration using the same methodology as the initial test, and the flow rate through heat exchanger “A” was recorded as 920 gpm. The submitted ICN stated that the flow rate recorded during the initial test was 930 gpm. The minor difference was attributed to slight variations in valve position and fluid temperature. This does not constitute a material change to the original ITAAC determination basis because even though the numerical result is different, the acceptance criteria are still met and none of the other notification thresholds were exceeded. Therefore the ICN is still a complete and valid ITAAC Closure representation.
- An ITAAC Post-closure Notification is not required.

# **SUMMARY OF PROPOSED APPENDIX D UPDATES**

# AP1000 Example ICN Updates

ICN	Change Summary
D-7	Specified the NDE methods required by ASME Code Section III
D-8	Added reference to industry standard ANSI/ISA-67.04.01-2000 and Regulatory Guide 1.105
D-30	Specified the NDE methods required by ASME Code Section III
D-34	Added reference to industry standard IEEE 450-1995 Added numerical test results: “The recorded voltage remained within the ranges identified in Attachment 1 ...”
D-35	Clarified the scope of the inspection performed
D-36	Added numerical test results: “The recorded voltage and frequency remained within the ranges identified in Attachment 1 ...”
D-37	Clarified the description of the inspection performed. Included numerical inspection results (range from X to Y) and compared to Acceptance Criteria

# AP1000 Example ICN Updates

ICN	Change Summary
D-40	Described the testing that was performed. (Existing letter simply referenced the test procedure.)
D-41	Clarified description of testing.
D-48	Provided a description of the inspection performed, similar to current examples D32 and D45
D-49	Provided additional detailed description of the testing performed
D-50	Clarified the description of analysis and testing performed per April 10 <sup>th</sup> discussion Added numerical results
D-51	Clarified description of testing Added numerical results
D-54	Added reference to industry standard ASME NOG-1 and provided additional description of testing

# AP1000 Example ICN Updates

ICN	Change Summary
D-100	Added description of how dry film density was determined Clarified inspections performed, and design aspects that precluded other potential inspections.
D-101	Added numerical results

## ICN Examples Not Requiring Changes Based on April 10<sup>th</sup> meeting

The following ICN Examples were reviewed and determined to contain sufficient information based on NEI 08-01, Regulatory Guide 1.215, and the additional guidance discussed on April 10<sup>th</sup>.

D-2, D-6, D-9, D-10, D-15, D-18, D-28, D-29, D-31, D-32, D-33, D-38, D-39, D-42, D-43, D-44, D-45, D-46, D-47, D-52, D-53, D-102



# ESBWR Example ICN Updates

ICN	Change Summary
D-11	Provided additional detail and clarified the actual isolation valve testing performed
D-12	Minor clarifications
D-13	Clarified that “visual leak checks” were performed, and the frequency at which they were performed
D-14	Clarified the description of the testing performed
D-16	Added reference to DCD Tier 2 Section for additional description of the inspection process. Added specific reference to NEI 08-01 section for technical justification Added numerical inspection results
D-17	Added numerical inspection results Minor clarification to description of inspection performance Added specific reference to NEI 08-01 section for technical justification

# ABWR Example ICN Updates

ICN	Change Summary
D-3	No changes required
D-4	Provided additional description of testing performed in item 3a
D-5	No changes required

# APWR Example ICN Updates

ICN	Change Summary
D-19	Deleted. Redundant to Example D-101

# EPR Example ICN Updates

ICN	Change Summary
D-20	No Changes Required

# Next Steps

- Incorporate these changes into NEI 08-01 Rev 5 (along with incorporation of other NRC comments)
- Submit NEI 08-01 Rev 5