ITAAC Closure Verification Process (ICVP)



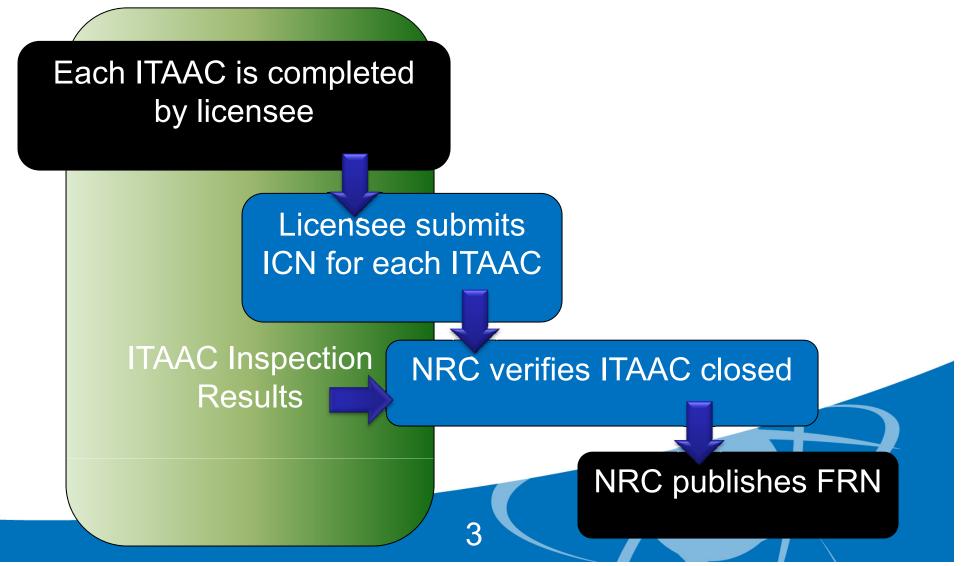
ITAAC Closure Notifications (ICNs)



- 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 (ICVP)



- 100% of ICNs reviewed by DCIP
 - A timely and effective review conducted by reviewer(s) who understand its purpose and defined scope.
 - Input as needed from technical experts
- NRC inspections completed prior to review of ICNs



Outcomes of Closure Review

– ITAAC verified successfully completed

- ICN had insufficient information or required clarification
- A potential material concern



ITAAC Verified Successfully Completed



- A draft FRN is generated for multiple ITAAC on a monthly or quarterly basis
- Successful completions of multiple ITAAC are:

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- published in *Federal Register*
- presented on NRC website

Insufficient Information vs Potential Material Concern



- Insufficient information means not enough information to determine whether ITAAC was met or not met
- Potential Material Concern Based on information in ICN or review of other external information, the NRC believes ITAAC was not met



Insufficient Information or Clarification in ICN

- NRC will notify the licensee by a public phone call or issue a letter depending on the complexity of the issue
- Licensee will submit a new ICN of record
- The ICVP will be initiated for the new ICN

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Potential Material Concern



- NRC will inform the licensee of the concern by phone and follow-up with a letter as warranted
- Region II performs inspections for a valid concern and confirms an ITAAC finding
- Licensee performs corrective actions and submits a new ICN of record

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ICVP initiated for the new ICN

ITAAC Finding



- Identified by construction or vendor inspection program
- Associated with a specific ITAAC
- Material to the ITAAC acceptance criteria.
- An ITAAC finding can occur from time inspections are implemented for an ITAAC until the 52.103(g) finding

ICNs or IPCNs



 ITAAC Post-Closure Notification (IPCN) is the letter the licensee sends in accordance with 10 CFR 52.99(c)(2) to notify the NRC of new information that materially alters the bases for determining that either inspections, tests, or analyses were performed as required, or that acceptance criteria are met. The letter should identify what changed, why the change occurred and the basis for concluding that closure of the ITAAC remains valid per NEI 08-01, Revision 5



ICNs or IPCNS



- ICN of record must be established for each ITAAC based on completion of ICVP review
- IPCN should be submitted for those conditions identified in regulatory and industry guidance once there is an ICN of record