

Uncompleted ITAAC Notifications (UINs) And Scheduled Fuel Load Notifications

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Discussion Topics

- Purpose
- Background
- Uncompleted ITAAC Notifications (UINs)
- Scheduled Fuel Load Notifications
- Next Steps

Purpose

- To discuss format and content of the Uncompleted ITAAC Notifications (UINs) and Scheduled Fuel Load Notifications letters

Background

- *Section 52.99 (c)(3) Uncompleted ITAAC notification: “If the licensee has not provided, by the date 225 days before the scheduled date for initial loading of fuel, the notification required by paragraph (c)(1) [ITAAC closure notification] of this section for all ITAAC, then the licensee shall notify the NRC that the prescribed inspections, tests, or analyses for all uncompleted ITAAC will be performed and that the prescribed acceptance criteria will be met prior to operation.”*
- *Section 52.99(c)(3) further states that the notification “must provide sufficient information to demonstrate that the prescribed inspections, tests, or analyses will be performed and the prescribed acceptance criteria for the uncompleted ITAAC will be met, including, but not limited to, a description of the specific procedures and analytical methods to be used for performing the prescribed inspections, tests, and analyses and determining that the prescribed acceptance criteria are met.”*

Background

- 52.103, Operation under a combined license, (a) states “The licensee shall notify the NRC of its scheduled date for initial loading of fuel no later than 270 days before the scheduled date and shall notify the NRC of updates to its schedule every 30 days thereafter.”

Uncompleted ITAAC Notifications (UINs)

- NEI 08-01, Appendix E-1 – Uncompleted ITAAC Notification Cover Letter Template
 - Pursuant to 10 CFR 52.99(c)(3), {Licensee} hereby notifies the NRC that as of {month/day/year}, {Site Name and Unit #} Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) items listed in Enclosure 1 will not be completed 225-days prior to initial fuel load currently scheduled for {month, day, year}. [Enclosure 2 describes the plans for completing each ITAAC listed in Enclosure 1.](#)
- Enclosure 2 – Will there be one pdf for each UIN or will there be one pdf for the entire letter?
- Enclosure 1 – Complete set or not?
 - *[With this letter, {Licensee} has provided the entire set of notifications for ITAAC that will not be completed 225-days prior to initial fuel load. OR {Licensee} will at a later date provide additional notifications for ITAAC that will not be completed 225-days prior to initial fuel load.]*

Uncompleted ITAAC Notifications (UINs)

- Appendix E-2 – Uncompleted ITAAC Notification Template for ITAAC-Specific Enclosure(s)
 - Subject Line – Add "(ITAAC identifier should exactly match the ITAAC number in the COL)" which is from the Appendix D-1 template.
 - Design Commitment and Acceptance Criteria are missing a period, "." after the word source.

Scheduled Fuel Load Notifications

- 52.103, specifies that licensee inform the NRC 270 days before scheduled fuel load date
- Format similar to other letters sent to NRC
- Content:
 - Anticipated date (270 days in the future) of initial loading of fuel (initial letter) or anticipated date (updates) and reason for change, if applicable
 - Assumptions in determining date including using NRC guidance on timeframes for completion

Next Steps

- Future meetings to continue discussing Scheduled Fuel Load Notifications format and content
- NRC needs to develop guidance for estimates of time to complete ITAAC reviews and 52.103(g) finding
- Future meetings on guidance for scheduling of initial fuel loading