

# ITAAC & FFD Requirements

August 21, 2014



# 10 CFR 26.4(e)(4)

- (e) When construction activities begin, any individual whose duties for the licensees and other entities in § 26.3(c) require him or her to have the following types of access or perform the following activities at the location where the nuclear power plant will be constructed and operated shall be subject to an FFD program that meets all of the requirements of this part, except subparts I and K of this part:
  - (4) Witnesses or determines inspections, tests, and analyses certification required under Part 52 of this chapter;

# Background

- An **AP1000**<sup>®</sup> ITAAC requires measurement of certain shop fabricated tanks to determine their volume.
- Typically performed off-site by the supplier, some tanks were recently being measured on-site following delivery of the tanks.
- When reviewing FFD requirements in 10 CFR 26.4, it was determined that the personnel operating the measurement equipment should be in the FFD program per 10 CFR 26.4(e)(4) solely because the measurements supported future ITAAC completion.
- This resulted in a delay of 4 workdays while personnel completed site access enrollment. This can be accommodated now, but could become problematic late in construction.

# Questions/Discussion Topics

- What was the historical context for specifically including witness/determination of ITAAC in 10 CFR 26.4(e)(4), in addition to the existing requirements for safety- or security-related activities in 26.4(e)(3), 26.4(e)(5), and 26.4(f)?

# Questions/Discussion Topics

- Potential alternatives to “*at the location*” for ITAAC not required to be performed at site
  - For example, ITAAC that state “as-built” and are therefore expected to be performed on-site, vs. those that don’t include “as-built” language
  - Activities that are not safety-or security- related (not within the 10 CFR 26.5 definition of “Construction”)
- Practical implementation of “*witnesses or determines*” ITAAC