

**Draft Regulatory Guide 1.215
Revision 2 (DG-1316)**

**“Guidance for ITAAC Closure Under
10 CFR Part 52”**

Introduction

- Initial issuance of Regulatory Guide 1.215 in October 2009, endorsing NEI 08-01, “Industry Guideline for the ITAAC Closure Process under 10 CFR Part 52” Revision 3
- Revision 1 to RG 1.215 issued May 2012, endorsing NEI 08-01 Revision 4
- Draft Revision 2 to RG 1.215 endorses NEI 08-01 Revision 5 - Corrected
- 60-day public comment period ends March 6th 2015

Formatting Change to RG 1.215:

- Formatting changes to the template since the 2012 version of the RG to enhance clarity and usability
- Previous format promoted stand-alone document with more narrative
- “Harmonization with International Standards” added at the end of Section B supports an effort to review and incorporate elements from international standards; this section documents that effort and provides references to related international standards when appropriate

Additional Guidance Section C

- Adopt a graded QA approach for the completion of NSR ITAAC
- ITAAC closure notifications should use the nomenclature and numbering scheme of the ITAAC identified in the COL to minimize errors and ensure consistent referencing
- All notifications on an ITAAC under 10 CFR Part 52.99 should include the ITAAC Index number and ITAAC Section number assigned to the ITAAC in the COL as part of the subject line
- Citing in the IDB the specific relevant code section(s) or article(s) used in performing the ITAAC can facilitate the staff's review of the ICN
- Guidance offered for the content of the 10 CFR 52.103(a) scheduled fuel load notification

Additional Guidance Section C

- The design and configuration control program should include an assessment and evaluation that confirm that the ITAAC potentially affected by a proposed change are still valid and that assure the functionality originally intended
- For “as-built” inspections and tests performed at other than the final installed locations and designated as “standard industry practice”, licensee must demonstrate in the ICN that it’s “standard industry practice”. Also, the performance of the inspection or test in this circumstance must still be technically justifiable
- Appendix A includes detailed discussion of when a license amendment is required in the ITAAC maintenance context
- Regarding use of the examples in 08-01, a licensee should ensure that an example applies to its particular circumstances, and the “sufficient information” required must be determined by specific facts