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Guidance for ITAAC Closure Under 10 CFR Part 52

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Guidance for ITAAC Closure; Request for Comment on Draft Regulatory Guide

80 FR 265

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Comment on FR Doc # 2014-30834

1/5/2015

Submitter Information

Name: Camille Zozula
Submitter's Representative: Westinghouse Electric Company

General Comment

Please see attached file.

Attachments

LTR-NRC-15-9

SUNSI Review Complete
Template = ADM - 013
E-RIDS = ADM-03
Add = J. Gaslevic (JEG1)
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LTR-NRC-15-9
February 17, 2015

Subject: Transmittal of Westinghouse Electric Company Comments on Draft Regulatory Guide DG-1316 [Docket ID NRC-2014-0277]

Dear Ms. Bladey,

Thank you for the opportunity to provide comments on the proposed Revision 2 of Regulatory Guide 1.215, "Guidance for ITAAC Closure Under 10 CFR Part 52."

Please find enclosed the Westinghouse Electric Company (Westinghouse) comments on the draft Regulatory Guide.

For technical questions regarding the enclosed comments, please contact Brian Bedford at (803) 932-5802.

Very truly yours,

A handwritten signature in black ink, appearing to read 'JA Gresham'.

James A. Gresham, Manager
Regulatory Compliance

Attachment

Westinghouse Comments on DG-1316

Affected Section	Comment/Basis	Recommendation
1. Page 1, Purpose	The Section refers to 10 CFR 52.99, however, the reference (Ref. 1) is for 10 CFR Part 52.	Revise Ref. 1, page 9
2. Page 3, Background, 2 nd paragraph	<p>RG 1.215 draft Rev 2 states: “The NRC uses these notifications to determine whether the Licensee has <u>successfully completed ITAAC, to verify that acceptance criteria are met</u>, to facilitate public participation in the ITAAC hearing process, and <u>to plan inspections</u>. This RG, through its approval for use of an industry guidance document, describes methods that the NRC staff considers acceptable for licensees to use for <u>documenting, reporting, and maintaining</u> the satisfactory completion of the ITAAC in the COL as required by 10 CFR 52.99” (emphasis added)</p> <p>This draft does not discuss the submittals required to satisfy 10 CFR 52.99(a), therefore the statement regarding planning inspections is irrelevant. (Note that Revision 1 did contain some discussion on the 52.99(a) submittals.)</p> <p>The inspections to determine if the ITAAC have been successfully completed occur via different Inspection Manual Chapters (IMCs), and are typically done prior to the submittal of the ITAAC Closure Notification (ICN). The review is/should be to determine if the notification contains the appropriate level of detail to describe how the ITAAC was satisfied.</p>	Recommend revising the first sentence above to better correspond to the second sentence in the paragraph and the VEF process.

Affected Section	Comment/Basis	Recommendation
3. Page 6, item c	<p>The bulleted information gives the perception that if the index number goes up to 875, there will be 875 ICNs for that unit. This is not the case where LARs have been submitted to delete ITAAC. See index number 474 in the VCS COL Appendix C for an example.</p> <p>Alternatively, it is possible for an LAR to add a new ITAAC in the middle of the number sequence.</p>	<p>Recommend acknowledging that there is not a one-for-one correlation between index number and the total number of ITAAC for a Licensee.</p>
4. Page 6, Item f	<p>It is unclear why this paragraph is included. An assessment of whether the ITAAC in the COL are still valid is part of the overall design and licensing change process, and not directly related to ITAAC closure. The NRC has separate regulations that govern the revision to the COL, which would include revision to ITAAC.</p>	<p>Recommend deleting this paragraph.</p>
5. Page 6, Item g	<p>It is not clear what exception or additional guidance to NEI 08-01, Revision 5 – Corrected is being discussed in this paragraph. It appears to be paraphrasing/reinforcing what is already in NEI 08-01 Section 9.</p>	<p>If there is no exception or additional guidance, delete this paragraph. If there is an exception or additional guidance, more clearly state what it is.</p>
6. Page 7, item 2	<p>Use of Examples section indicates that sufficient information will be determined with respect to each ITAAC closure. The significant effort of adding the example ICNs to NEI 08-01 was to give the Licensees and the public some certainty as to what level of detail would be required for a similar “type” of ITAAC, regardless of the technology. It is understood that the examples should be used to inform the submittal of the ICNs for each site, however, the level of detail for each example ICN has been agreed upon and should be sufficient for an actual ICN submittal.</p>	<p>Recommend adding to the end of the 2nd sentence, “...as it is presented and written in the guide, <u>but rather as an example of what constitutes sufficient information for the ITAAC presented.</u>”</p>
7. Appendix A	<p>It is unclear why this appendix is contained with the ITAAC Closure Document. The NRC has separate regulations that govern the revision to the COL, which would include revision to ITAAC.</p>	<p>Recommend removal.</p>