

# ITAAC Closure Notifications (ICNs)

## Uncompleted ITAAC Notifications (UINs)

### Status and Best Practices

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# ITAAC Closure Notifications

|              | ICNs under review | Federal Register Notices | Verified   |
|--------------|-------------------|--------------------------|------------|
| Vogtle 3     | 30                | 11                       | 42         |
| Vogtle 4     | 28                | 10                       | 38         |
| Summer 2     | 4                 | 12                       | 30         |
| Summer 3     | 4                 | 11                       | 29         |
| <b>Total</b> | <b>52</b>         | <b>44</b>                | <b>131</b> |

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EACH AP1000 COL HAS APPROXIMATELY 875 ITAAC

THE STAFF HAS RECEIVED 205 TOTAL ITAAC CLOSURE NOTIFICATIONS (ICNS) FOR VOGTLE UNITS 3 AND 4 AND V.C. SUMMER UNITS 2 AND 3

# UNCOMPLETED ITAAC NOTIFICATIONS

|         | UINs under review | Verified | Total |
|---------|-------------------|----------|-------|
| Vogle 3 | 143               | 66       | 209   |

- 0 Potential Problem Letters (PPL)
- 3 Insufficient Information Letters (IIL)
- 12 ICNs being evaluated for IIL
- 62 UINs being evaluated for IIL

# “Tell the Story”

- Minimize using references to internal non-publically available information.
- When you must reference non-publically available information provide a summary description for the process, procedure or analytical methods (key steps) used to carry out the inspections, tests, and/or analyses
  - If more than one method is available to meet the acceptance criteria, the description must clearly state which method was selected
- Describe that the acceptance criteria have been met, if applicable state the results of numerical values in the results discussion
  - volume, flow rates, temperatures, or pressures, etc.

# ASME YEAR/ADDENDA & ARTICLE/SUBARTICLE

- When an industry code or standard is utilized in the performance of an ITAAC, it should be referenced with as much specificity as practical.
- Nuclear Energy Institute May 9<sup>th</sup> 2013 Presentation: citing specific American Society of Mechanical Engineers (ASME) Code or ASME Qualification of Mechanical Equipment (QME) Standard sections / articles
  - Current level of detail is consistent with current licensing basis.
- For the comments related to citing specific sections or articles of the ASME Code or QME-1 Standard, the NRC staff stated that this would assist the NRC staff and public stakeholders in better understanding the specifics processes used to meet the acceptance criteria.
- 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

## **“As-Built”**

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.

# DEFINITIONS / GENERAL PROVISIONS

**As-built** means the physical properties of a structure, system, or component following the completion of its installation or construction activities at its final location at the plant site. In cases where it is technically justifiable, determination of physical properties of the as-built structure, system, or component may be based on measurements, inspections, or tests that occur prior to installation, provided that subsequent fabrication, handling, installation, and testing does not alter the properties.

**Functional Arrangement (for a system)** means the physical arrangement of systems and components to provide the service for which the system is intended, and which is described in the system design description.

**Test** means the actuation, operation, or establishment of specified conditions to evaluate the performance or integrity of as-built structures, systems, or components or to evaluate the performance of a program.

When the term "exist," "exists," or "existence" is used with respect to an item discussed in the acceptance criteria, it means that the item is present and meets the design commitment.