

ITAAC Closure and Verification Demonstration Final Report
June 1, 2017
Enclosure 1
Recommendations

NOTE: That the recommendations included in the body of the report have been consolidated into these 12 recommendations below based on their topics and actions.

Action Item	Lead/Supporting Role
Weekly Public Meetings	
<p>1. Utilize weekly public meetings to facilitate resolution of critical issues associated with ICN and UIN reviews, including items such as the intent of an ITAAC, ICNs with challenges, methods for resolution of issues, and informed decision making.</p> <p>In addition, establish standing agenda items during the weekly public meeting to discuss expected ICN submittal workloads to allow early notification of resource needs and critical process points.</p> <p>Increase the frequency of public meetings to accelerate the resolution of emerging ITAAC closure issues as the surge approaches.</p>	<p>Lead = DCIP</p> <p>Support = DNRL</p>
Clarity in Existing Industry Guidance	
<p>2. Develop an FAQ-type process to provide a forum to document discussions and resolutions of issues associated with the content of ICNs and UINs, which may be due to gaps in existing guidance or interpretation discrepancies.</p> <p>3. Work with stakeholders to identify complex ITAAC issues by reviewing early submittals of uncompleted ITAAC notifications and develop clear expectations for the content of the associated ICN submittals. This effort will include identifying when complex ITAAC will be completed during the construction schedule.</p>	<p>Lead = DCIP</p>
NRC Processes Guidance Enhancement	
<p>4. Revise applicable NRO office instructions to ensure lessons learned and enhancements for the ICN process, identified during this demonstration project, are institutionalized. The revision should include, but is not limited to, the development of the criteria of when technical reviewer referral is needed during the reviews of ITAAC notifications, the evaluation of the requirement of completing half of targeted ITAAC before completing verification of non-targeted ITAAC within an ITAAC family, and the involvement of technical staff for all ITAAC notifications related to security and emergency-preparedness. Lead = DCIP</p> <p>Make the revised NRC office instruction NRO-REG-103 publicly available to give stakeholders insight into the NRC's ITAAC notification review process. Lead = DCIP.</p> <p>5. Enhance NRC processes, including associated governing documents, communications, and training, to ensure timely identification and resolution of concerns or findings material to ITAAC, such that ITAAC inspection results</p>	<p>As stated in individual item</p>

<p>support key activities and milestones in the ITAAC closure verification process. Lead = DCIP and RII.</p> <p>a. Enhance/develop the following processes: TARs, URIs, ITAAC inspection findings, allegations and petitions, and IPCNs. For TARS, consider the frequency of performing this process; the timeliness of TAR processing; and interactions with licensees for visibility purposes. Lead = DCIP/CIPB, Support = RII</p> <p>b. For inspection findings, consider enforcement actions and internally and externally disputed findings. Consider which NRC process activities, if any, can be done in parallel with the evaluation of an ITAAC technical concern. Lead = DCIP, Support = RII.</p>	
Performance Dashboards	
<p>6. Create an integrated, highly visible, internal, color-coded performance dashboard to track the status of each step for ICN reviews and inspection process for early identification of ITAAC closure related issues for management attention and resolution.</p> <p>Specific process steps to measure should include:</p> <ul style="list-style-type: none"> • The status of each step for ICN reviews. • Key aspects of the inspection process, including the timeliness of report issuance, inspection initiators, and inspection outcomes • Potential inspection scheduling or resource issues 	<p>Lead = DCIP Support = RII</p>
Inspection Scheduling	
<p>7. Determine the most efficient location and time for inspections. Continue to focus on short-duration construction activities, such as installing the reactor vessel, which are unlikely to be repeated for additional inspection opportunities.</p> <p>Additionally, verify that test procedure inspections are scheduled when procedures are issued and available versus when the tests are being performed.</p>	<p>Lead = RII Support = DCIP</p>
Timeliness of Inspection Reports	
<p>8. Establish timeliness requirements for inspection disposition including inspection completion in CIPIMS and inspection report issuance to support the ITAAC surge and the 10 CFR 52.103(g) finding.</p>	<p>Lead = DCIP Support = RII</p>
Maintain Qualified Staff	
<p>9. To ensure continued ICN review and inspection capacity, cross-train additional staff to support ICN workflow capacities and ITAAC inspections.</p> <p>For inspector qualification, the NRC will incorporate construction inspector training into IMC-1245 and continue cross-qualification for inspectors at plants operating under 10 CFR Part 52.</p>	<p>Lead = DCIP Support = RII</p>

Organizational Structures	
10. Establish a temporary organizational structure with senior executive leadership approximately 12-months before projected fuel load. This organization would oversee and coordinate the ITAAC closure verification process to ensure appropriate decision making and the prompt identification and resolution of issues.	Lead = NRO
External Stakeholders	
11. Create a message map on key aspects and updates of the ITAAC process for external stakeholders. Update this message map on a quarterly basis.	Lead = DCIP
12. Beginning in 2018, conduct public workshops as appropriate to further refine and enhance the ITAAC closure process. Lead = DCIP.	