

January 10, 2018

MEMORANDUM TO: Aida Rivera-Varona, Branch Chief
Human Performance, Operator Licensing, and ITAAC Branch,
Division of Construction Inspection
& Operational Programs
Office of New Reactors

FROM: Carl Weber, Reactor Operations Engineer **/RA/**
Construction Inspection Program Branch
Division of Construction Inspection
& Operational Programs
Office of New Reactors

SUBJECT: SUMMARY OF DECEMBER 12, 2017, CATEGORY 1 PUBLIC
MEETING WITH SOUTHERN NUCLEAR OPERATING
COMPANY FOR THE U.S. NUCLEAR REGULATORY
COMMISSION INSPECTIONS, TESTS, ANALYSES, AND
ACCEPTANCE CRITERIA CLOSURE TABLETOP

On December 12, 2017, the U.S. Nuclear Regulatory Commission (NRC), Office of New Reactors (NRO) held a Category 1 public meeting to discuss topics relating to inspections, tests, analyses, and acceptance criteria (ITAAC) closure reviews, ITAAC inspection processes, and the 10 CFR 52.103(g) finding (Agencywide Document Access and Management System (ADAMS) Accession Numbers ML17325B174 (Meeting Notice), ML17349A989 (NRC Presentation), ML17352A707 (Southern Nuclear Operating Company (SNC) Presentation), and ML17352A707 (Handouts – Example ITAAC Notifications for ITAAC 13 and 19 – for discussion during the tabletop)). The purpose of the meeting was to promote better understanding of ITAAC Closure Notification (ICN) reviews and ITAAC inspections, focused on the processing of complex ICNs in order to minimize potential issues that could impact the review of ICNs submitted near the end of construction. The meeting was structured to provide the status of staff's action from the 2017 ITAAC demonstration project, perform a tabletop exercise covering the ITAAC review process and inspection processes of two complex ITAAC, and discuss the steps associated with the staff's 10 CFR 52.103(g) finding.

SNC requested that two consolidated ITAAC from LAR 17-006, ITAAC 13 and 19, would be topics during the public meeting. In preparation, SNC submitted proposed ICNs for staff review. The proposed ICNs are dedicated for public meeting use only. Staff presented comments on these proposed ICNs during the meeting.

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Staff and SNC presented on a variety of topics including:

- The staff provided the status of each of the action items that were previously identified during the ITAAC Demonstration Project and documented in a report issued in June, 2017 (ML17130A773).
- The staff presented an overview of the ITAAC Closure Verification Process, as well as ICN content expectations.
- The staff presented the results of its review of the proposed ICN for ITAAC 13. The staff had previously provided comments on the draft Uncompleted ITAAC Notification for ITAAC number 355, which is very similar to ITAAC 13. They both address the piping and components designed and constructed to the ASME Code Section III requirements. Most of the staff's comments on ITAAC 355 were incorporated in the proposed ICN for ITAAC 13. During the presentation, the NRC provided a couple of additional recommendations to enhance the clarity of their submittal.
- The staff presented the results of its review of the proposed ICN for ITAAC 19. This ITAAC is consolidated from three seismic Category 1 equipment qualification ITAAC and two harsh environment Class 1E equipment qualification ITAAC for the Reactor Coolant System (RCS). Overall, the quality of the ICN was acceptable, but the staff could not determine which test or analysis was to be used for the qualification. The staff noted that an ICN should specify which methodology was used if multiple choices are available in the referenced standard. SNC responded that the level of information included in the proposed ICN followed existing guidance for ITAAC closure. The staff agreed to provide additional clarity to this comment and continue this discussion at a future public meeting.
- The staff also provided an overview of how inspection processes would be implemented for the two ITAAC and how the inspection process is coordinated with the ICN review process. SNC then presented an overview of its ITAAC closure processes for the two ITAAC, including proposed strategies for ICN review and inspection.
- The staff presented an overview of the NRC's internal ITAAC metrics and provided examples of the dashboards that will be used to track the metrics.
- The staff gave a presentation on potential inspection issues that could impact ICN processing, with a focus on issues that could arise near the end of construction.
- The staff provided a short presentation highlighting the key activities and timelines for the ITAAC hearing process and steps to the staff's 10 CFR 52.103(g) Finding. The staff noted that the notice of intended operations could be issued as early as 285 days prior to the scheduled date for fuel load provided the Uncompleted ITAAC Notifications were submitted significantly in advance of that date. Additionally the staff discussed how late filed allegations would be handled in accordance with NRC Management Directive 8.8. The staff also discussed the limited scope of the ITAAC hearing process under 10 CFR 52.103(a) and the broader petition process per 10 CFR 52.103(f) to modify the terms and conditions of a combined license. SNC made a presentation on their steps to 103(g) and emphasized the need for close coordination and communications between SCN and NRC via an established periodic meeting schedule commencing approximately 255 days prior to fuel load.

Each presentation allowed for a discussion between the NRC staff and SNC representatives, with opportunities for public engagement before the end of the meeting. Discussion between the staff and SNC resulted in the following action items:

- The staff will coordinate with SNC on ITAAC metrics so that metrics can be included as a topic during weekly ITAAC conference calls starting in January, 2018.

- The NRC will include ITAAC timelines as a topic during a future public meeting with SNC.
- The NRC will provide clarity to comments presented for ITAAC 19 and will discuss the appropriate ICN level of detail with respect to identifying which method was used when multiple methods are available, at a future public meeting.

A list of meeting attendees is attached.

One member of the public, representing the Nuclear Energy Institute, was in attendance. The NRC received two public meeting feedback forms at the meeting, and they were entered into the Public Meeting Feedback System. Please direct any inquiries to Carl Weber at Carl.Weber@NRC.GOV or Nicole Covert at Nicole.Covert@NRC.GOV

Enclosure
List of Attendees

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 Jamie Heisserer
 Aida Rivera-Varona
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 Laura Dudes
 Tim McGinty
 William Jones
 Victor Hall
 HOIB r/f

ADAMS Accession Number: ML17354B288 via email* NRC-001

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|--------|---------------|---------------|----------------|
| OFFICE | NRO/DCIP/CIPB | NRO/DCIP/CIPB | NRO/DCIP/HOIB |
| NAME | CWeber * | VHall | ARivera-Varona |
| DATE | 1/5/2017 | 1/10/2017 | 1/10/2017 |

OFFICIAL RECORD COPY

Attendance List
Category 1 Public Meeting
(ITAAC Tabletop)
Region II - Marquis One Tower
December 12, 2017

| | |
|----------------------|---------------|
| Aida Rivera-Varona | NRC |
| Andrew Lerch | NRC |
| Brian Griman | NRC |
| Carl Weber | NRC |
| Calvin Morrow | SNC |
| Christopher Welch | NRC |
| Greg Wilson | SNC |
| Ian Cozens | NRC |
| Jamie Heisserer | NRC |
| Jim Gaslevic | NRC |
| Jim Hughes | SNC |
| Kara Stacey | SNC |
| Kevin J. Durrwachter | SNC |
| Laura Dudes | NRC |
| Michael Spencer | NRC (Webinar) |
| Mike Yox | SNC |
| Nick Bailey | SNC |
| Nicole Coovert | NRC |
| Peter LeRoy | SAIC-WEC |
| Russ Bell | NEI |
| Surinder Arora | NRC |
| Tara Inverso | NRC |
| Tim McGinty | NRC |
| Victor Hall | NRC |
| William Jones | NRC |