

From: [Notich, Mark](#)
To: [Keith, Felicia](#)
Subject: FW: NEI Comments on Draft SRP 14.3.3, Piping Systems and Components ITAAC, 82 Fed. Reg. 42709; Docket ID NRC-2017-0187,
Date: Tuesday, February 26, 2019 7:59:34 AM
Attachments: [NEI Comments on Draft SRP 14-3-3.pdf](#)

As requested...

From: TSCHILTZ, Michael <mdt@nei.org>
Sent: Monday, November 13, 2017 4:13 PM
Subject: [External_Sender] NEI Comments on Draft SRP 14.3.3, Piping Systems and Components ITAAC, 82 Fed. Reg. 42709; Docket ID NRC-2017-0187,

THE ATTACHMENT CONTAINS THE COMPLETE CONTENTS OF THE LETTER

November 13, 2017

Ms. Cindy K. Bladey
Chief, Rules, Announcements, and Directives Branch (RADB)
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
Sent directly to www.federalregister.gov

Subject: NEI Comments on Draft SRP 14.3.3, *Piping Systems and Components ITAAC*, 82 Fed. Reg. 42709; Docket ID NRC-2017-0187

Project Number: 689

Dear Ms. Bladey:

On behalf of the nuclear energy industry, the Nuclear Energy Institute (NEI)^[1] appreciates the opportunity to provide comments on the subject draft SRP 14.3.3 as requested in the referenced *Federal Register* notice.

We appreciate that the NRC has incorporated language developed as part of joint industry-NRC efforts to establish standardized ITAAC for use in future design certifications. Use of standardized ITAAC can be expected to enhance consistency, streamline the development and NRC review of design certification ITAAC, and facilitate efficient ITAAC implementation and closure. We encourage and expect that SRP 14.3 and the subsections SRP 14.3.1-12 will be updated to reflect the outcomes of the ongoing efforts to develop standardized ITAAC.

However, it should be noted that efforts to establish an appropriate set of standardized ITAAC are not yet complete, and draft SRP 14.3.3 adopts certain piping ITAAC language to which the industry strenuously objects. Of greatest concern is the proposed ITAAC on "installed

configuration" of piping systems (see NEI Comment #11). This NRC staff-proposed ITAAC is ambiguous, unbounded and unverifiable. It is also entirely unnecessary as it is redundant to other ITAAC and to the role of the Quality Assurance Program. Complete industry comments on draft SRP 14.3.3 are provided in the attachment.

We strongly recommend elimination of the proposed installed configuration ITAAC and correction of the other significant departures from basic tenets of ITAAC identified in the attachment. At a minimum, the NRC should put the update of SRP 14.3.3 (as well as the rest of SRP 14.3) on hold pending resolution of key issues in the context of standardized ITAAC and ongoing design certification reviews.

If you have any questions concerning these industry comments, please contact me or Russ Bell (202.739.8087; rjb@nei.org).

Sincerely,

Michael D. Tschiltz
Senior Director, New Plant, SMRs and Advanced Reactors

Nuclear Energy Institute
1201 F Street N.W., Suite 1100
Washington, DC 20004
www.nei.org

P: 202.739.8083
M: 202.471.0277
E: mdt@nei.org



This electronic message transmission contains information from the Nuclear Energy Institute, Inc. The information is intended solely for the use of the addressee and its use by any other person is not authorized. If you are not the intended recipient, you have received this communication in error, and any review, use, disclosure, copying or distribution of the contents of this communication is strictly prohibited. If you have received this electronic transmission in error, please notify the sender immediately by telephone or by electronic mail and permanently delete the original message. IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS and other taxing authorities, we inform you that any tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties that may be imposed on any taxpayer or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

Sent through www.intermedia.com

[\[1\]](#) The Nuclear Energy Institute (NEI) is the organization responsible for establishing unified industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all entities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel cycle facilities, nuclear materials licensees and other organizations and entities involved in the nuclear energy industry.