

**Proposed Acceptance Criteria for
SNC's Draft License Amendment Request (LAR) on
Functional Arrangement ITAAC**

Acceptance Criteria:

For acceptance of a License Amendment Request (LAR) requesting deletion of specific Functional Arrangement ITAAC, the NRC staff considers that the licensee should provide the following information:

1. The LAR should (a) describe what the Functional Arrangement ITAAC verifies (including the method of verification), (b) describe the extent to which the remaining ITAAC duplicate the Functional Arrangement ITAAC verifications, and (c) to the extent that the Functional Arrangement ITAAC verifications are not duplicated by the remaining ITAAC, explain why it is acceptable for these matters not to be verified by ITAAC.
2. In describing what the Functional Arrangement ITAAC verify (including the method of verification), the LAR should be consistent with NRC-approved Uncompleted ITAAC Notifications (UINs) and the following discussion from Section 10.5 of NEI 08-01,¹ or the LAR should provide justification for an alternative approach:

The purpose of the system Functional Arrangement ITAAC, and the associated ITAAC Closure Notification, is to verify and document that the as-built system components conform to the Tier 1 Design Description, that is, (1) that components are physically arranged as shown in any referenced figure, and located as identified in any referenced table; and (2) that system components identified in the Tier 1 Design Descriptions are physically arranged as specified by the design. The capability to perform required system safety functions described in the Tier 1 Design Description is verified by other ITAAC, which are the subject of separate ITAAC Closure Notifications. It is expected that licensees will use detailed construction drawings during walkdown inspections to verify the functional arrangement of specified as-built components. These inspections may be performed any time after construction is completed to the extent that all Tier 1 components within the scope of the ITAAC are installed.

In particular, the LAR should address the physical arrangement of all system components identified in the Tier 1 design description to provide the service for which the system is intended, as described in the system design description.

3. For the most safety significant systems, for example, the Reactor Coolant System (RCS), Containment System (CNS), Passive Containment Cooling System (PCS), and Passive Core Cooling System (PXS), the LAR should describe how the remaining ITAAC will include a walkdown to verify the following functional arrangement attributes:

¹ The NRC staff accepted Nuclear Energy Institute (NEI) Report 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52," to provide a generic streamlined process for completion of ITAAC.

- a. Appropriate component tag numbers to ensure that the functional arrangement of the system is correct.
- b. Components and piping located in the flow path consistent with the construction drawing.
- c. Component installation consistent with the construction drawing (including orientation, type, and mounting).
- d. Piping installation consistent with construction drawing (including ASME class, size, slope, and supports).
- e. No significant adverse arrangement of components or piping that could impact function.
- f. Verification of adequate access for inservice inspection (ISI) and inservice testing (IST) activities, and confirmation that interferences are avoided.