

## Regulatory Guide Periodic Review

**Regulatory Guide Number:** 1.215, Revision 2

**Title:** Guidance for ITAAC Closure under 10 CFR Part 52

**Office/Division/Branch:** NRR/DANU/UARP

**Technical Lead:** Christopher Welch

**Staff Action Decided:** Revise

**1. What are the known technical or regulatory issues with the current version of the Regulatory Guide (RG)?**

Changes to the inspections, tests, analyses, and acceptance criteria (ITAAC) program have made some part of the guidance in RG 1.215, Revision 2, and Nuclear Energy Institute (NEI) 08-01, Revision 5 - Corrected, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52," which the RG endorses, no longer applicable. Changes to the program since issuance of Revision 2 include design acceptance criteria are no longer being used, an ITAAC for the design reliability assurance program is no longer required, the NRC's self-imposed requirement to inspect all emergency planning and security ITAAC has been removed, partial ITAAC closure notifications are not supported by our current process, ITAAC maintenance requires additional guidance, and several examples in Appendix H need to be re-evaluated. Additionally, the RG should be revised to align with any changes resulting from the development of the Advanced Reactor Construction Oversight Process and to incorporate the revisions based on 10 CFR Part 53, when the rulemaking is finalized.

**2. What is the impact on internal and external stakeholders of not updating the RG for the known issues, in terms of anticipated numbers of licensing and inspection activities over the next several years?**

Currently, there are no plants with Part 52 licenses that are scheduled to begin construction within the next several years. As a result, not updating the RG is not expected to have a significant impact. Further, the existing RG is still largely applicable.

**3. What is an estimate of the level of effort needed to address identified issues in terms of full-time equivalent (FTE) and contractor resources?**

No contractor support is needed. The effort expected for this update would be one individual's full-time support for approximately 2 weeks.

**4. Based on the answers to the questions above, what is the staff action for this guide (Reviewed with no issues identified, Reviewed with issues identified for future consideration, Revise, or Withdraw)?**

Revise

**5. Provide a conceptual plan and timeframe to address the issues identified during the review.**

This update effort will need to be synchronized with the finalization of both the Advanced Reactor Construction Oversight Process as well as the proposed Part 53. Additionally, staff need to engage with the NEI to discuss whether they intend to issue a revision to NEI 08-01 that reflects both the changes to the ITAAC process and incorporates Part 53 or whether the staff should issue standalone guidance.

## REFERENCES

1. NEI 08-01, Revision 5 - Corrected, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52," July 2013, ADAMS Accession No. ML13224A027.
2. Letter to Brian Whitley, Southern Nuclear Operating Company, "Maintaining Completion of Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Prior to Submission of the ITAAC Closure Notification," October 8, 2020, ADAMS Accession No. ML20282A582.
3. Memorandum to Andrea Veil, NRC, "10 CFR Part 52 Construction Lessons-Learned Report," January 16, 2024, ADAMS Accession No. ML23325A202.

**NOTE:** This review was conducted in April 2025 and reflects the staff's plans as of that date. These plans are tentative and subject to change.