"Report" ITAAC Update

Office of New Reactors Public Workshop

February 16, 2012

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"Report" ITAAC Effort

- Objective:
  - Develop standard report content, where appropriate, that promotes consistent format and technical content that will result in efficient NRC report reviews.
- Background:
  - The simulated ITAAC Closure and Verification Demonstration noted that significant differences in the expected level of detail included in the reports exist. Therefore, it may be beneficial to develop a consistent format and content for reports used to justify ITAAC closure.
  - Promote consistent NRC reviews
  - Aid in planning ITAAC inspections.

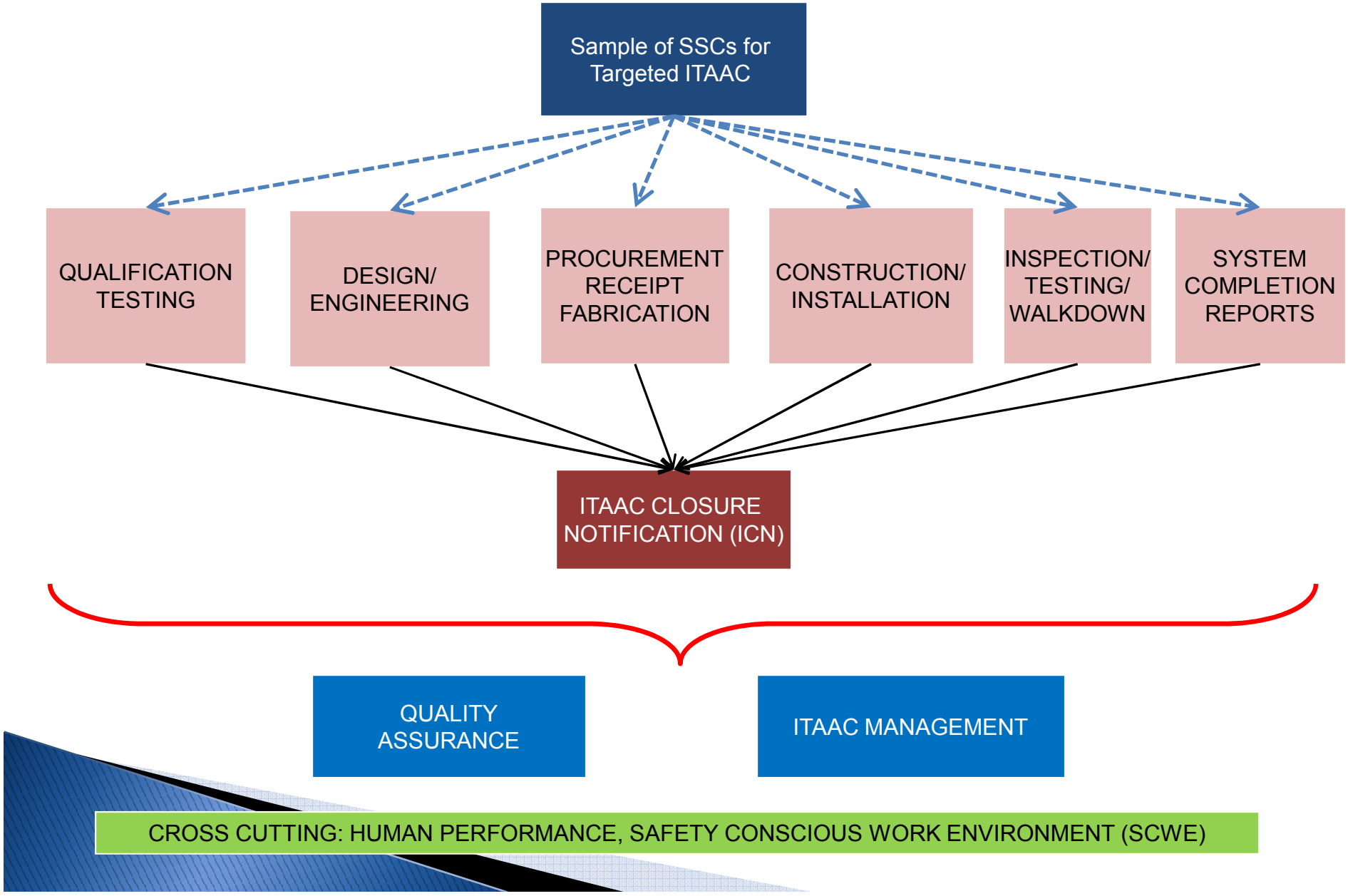
What are "Report" ITAAC?

- ITAAC that rely on a technical report in order to meet their acceptance criteria, e.g.:
  - A report exists and concludes…
  - A stress report exists…
  - A test report exists…
  - An analysis report exists and concludes…
  - Exist in all Part 52 new reactor designs under review

Inspection Objectives

- Verification of quality assurance processes (procurement, testing, analysis, data/record management, etc.) and **other support activities conducted** to **develop and produce** the Report
- Physically confirm (when possible) process attributes, and not focus solely on inspection of documentation
- Verification of technical attributes within the Report

Inspection Approach



Example Scenario

- From DCD Tier 1 (ITAAC 2.2.1-3 (2.a)):

Design Commitment	*ITA*	*AC*
2.a) The components identified in Table 2.2.1-1 as ASME Code Section III are designed and constructed in accordance with ASME Code Section III requirements.	*Inspection will be conducted of the as-built components as documented in the ASME design reports.*	*The ASME Code Section III design reports exist for the as-built components identified in Table 2.2.1-1 as ASME Code Section III.*

- The design commitment is that the component (e.g. Containment Vessel CNS-MV-01) is designed and constructed per Code. NRC inspection of this will be multi-part, as follows:
  - Part 1 – Inspection of the various processes used to construct the Containment Vessel, ultimately documented in the Containment Vessel Code Data Report (RII/CCI).
  - Part 2 – Inspection of the Containment Vessel Design Report (when available) to ensure Code limits are not exceeded and to verify selected attributes* within the Design Report (NRO).
  - Part 3 – Inspection of the Design Report, focusing on sampling reconciliation documentation of as-built changes as the Containment Vessel was constructed (NRO and RII/CCI).

    * The extent of this verification may depend on the level of design changes undertaken by the licensee.

Path Forward

- Proposed
  - Provide list to stakeholders
  - Obtain agreement to proceed with stakeholders
  - Complete grouping of reports
  - Develop report content/guidance
  - Continue public discussion on guidance/sample reports
- Continue development of ISG-024 and all of its appendices (supplemental guidance for the verification of “complex” ITAAC)