

ITAAC Closeout

Where Licensing and the Construction Inspection Program Come Together

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March 9, 2006

Construction Inspection Program (CIP)

- Construction Inspection a key element of ITAAC verification
- NRC workshop in May 2005 to solicit stakeholder input on elements of CIP that need clarification
 - Identify and discuss ITAAC determination basis
 - Discuss and types of documentation required for verification
 - Scenarios that could impact ITAAC compliance or verification
- Examples
 - Verification scenarios
 - Documentation

CIP Workshop Results

- Focus of licensee and NRC ITAAC determinations
 - ITAAC completion should be judged solely on satisfaction of acceptance criteria in Tier 1 ITAAC, not conformance with Tier 2 and underlying QA requirements
 - Conformance with Tier 2 and underlying QA requirements assured by normal licensee processes and NRC inspections
 - QA/QC problems can affect an ITAAC conclusion, e.g., miscalibrated test equipment could affect an ITAAC determination if greater than margin by which acceptance criterion was met
- Objective of NRC ITAAC verification: completion status of an ITAAC should be unambiguous (no “shades of gray”)

Workshop Results (cont'd)

- Role of licensee's Corrective Actions Program (CAP)
 - Construction and QA deficiencies addressed by the licensee's CAP, with no impact on ITAAC
 - Example: loose or missing bolts or similar QA/QC deficiencies identified during NRC ITAAC verification
 - Immaterial to ITAAC determination, so no impact on verification
 - Deficiency would be addressed via CAP (NRC inspectors likely would confirm this)
 - Same conclusion applies to post-ITAAC damage to SSCs
 - Would not affect prior ITAAC determination
 - Resolved through CAP and other processes that ensure equipment is restored appropriately
- ITAAC determinations adversely impacted only if ITAAC conclusion was based on incorrect information

Open Issue: ITAAC Completion

- Does the plant need to conform with all ITAAC the instant of the §52.103(g) finding?
- What if an ITAAC does not accurately confirm the design commitment?
- §52.99 notices reflect NRC staff concurrence with ITAAC completion; if subsequent information causes staff to reconsider a previous ITAAC determination, is the ITAAC invalidated?
- Under what circumstances should NRC be notified of subsequent information/events that affect a previously completed ITAAC?

Other Open Issues

- Can NRC base an ITAAC determination on all or part of a licensee document not on the docket?
- Which Part 2 processes will be used for ITAAC hearing opportunity?