

AFFIRMATION ITEM

RESPONSE SHEET

TO: Annette Vietti-Cook, Secretary
FROM: Chairman Gregory B. Jaczko
SUBJECT: SECY-12-0030 – FINAL RULE: REQUIREMENTS FOR
MAINTENANCE OF INSPECTIONS, TESTS,
ANALYSES, AND ACCEPTANCE CRITERIA
(RIN 3150-A177)

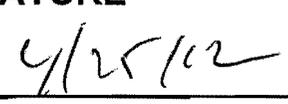
Approved Disapproved Abstain

Not Participating

COMMENTS: Below Attached None



SIGNATURE



DATE

Entered on "STARS" Yes No

**Chairman Jaczko's Comments on SECY-12-0030,
"Final Rule: Requirements for Maintenance of Inspections, Tests, Analyses, and
Acceptance Criteria (RIN 3150-A177)"**

Inspections, Tests, Analyses, and Acceptance Criteria, known as ITAAC, play a critical role in the new one-step process of 10 CFR Part 52. Verification of hundreds of ITAAC for each plant gives the NRC and the public confidence that the as-built plant meets all relevant expectations determined at the time of issuance of the combined license. This process is what ultimately ensures the as-built plant will be safe to operate. Over the coming years of construction, plant structures, systems, and components and their accompanying ITAAC will be completed. It's vital to ensure that once those ITAAC are completed, that the acceptance criteria are maintained throughout the remainder of the construction period.

Therefore, I approve the staff's proposed final rule for publication in the *Federal Register*. Beginning in 2008, significant effort has led to the completion of this ITAAC maintenance rulemaking, and the staff is to be commended for its work to identify implementation issues with an, as yet, untested process, involve stakeholders early and throughout the process, and ultimately present a well-reasoned final rulemaking. This final rule helps to ensure the Commission is provided sufficient information to make its 10 CFR 52.103(g) finding which ultimately allows the plant to operate, and ensures the public is provided access to necessary information to request a hearing, if desired.

It's important to note that recently issued COLs will be the first applications of the ITAAC process and there will undoubtedly be challenges that the staff and the industry did not foresee during the creation of the program. It's conceivable that emerging issues involving ITAAC, including clarity of ITAAC, will put schedule and resource pressure on both the NRC and licensees. Throughout the process, we must remain focused on ensuring safe and compliant construction, since the time to get things right is before operation.

With the recent issuance of both the Vogtle and Summer combined licenses, safety-related construction and inspection activities have begun in earnest. This places ever greater emphasis to ensure ITAAC, once met, remain met through the time of the Commission's 103(g) finding. As full implementation of the ITAAC program and processes are carried out for the first time, the staff should continue to proactively identify issues and bring them to the attention of the Commission.



Gregory B. Jaczko 4/25/12
Date