

# **Inspections, Tests, Analyses and Acceptance Criteria (ITAAC) Maintenance**

**Commission Briefing by Industry  
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# Industry Representatives

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# Discussion Topics

- **Progress to Date**
- **Section 52.103(g) Finding**
- **ITAAC Maintenance**
- **Going Forward**
- **Conclusions**

# Progress to Date

- **Agreement that ITAAC are closed and then maintained**
- **NRC endorsement of NEI 08-01, *Guidance for ITAAC Closure Under Part 52*, in progress via Regulatory Guide 1.215**
  - **ITAAC closure notifications to NRC**
  - **Auditable documentation to be maintained on site**

# Section 52.103(g) Finding

- **Section 52.103(g) requires the Commission\* to make a finding that the acceptance criteria in the combined license “are met”**

**\* 10 CFR 2.340(j) provides that the Commission, Director NRO, or Director NRR may make the Section 52.103(g) finding**

# Section 52.103(g) Finding

- **We agree with positions in SECY-09-0119:**
  - **the “are met” requirement is satisfied provided:**
    - **All ITAAC were verified to be met**
    - **Staff has confidence that the ITAAC determination bases have been maintained**
  - **ITAAC structures, systems, and components may be out-of-service at the time of the Section 52.103(g) finding**

# ITAAC Maintenance

- **Finalize supplement to NEI 08-01 to address ITAAC Maintenance**
  - **Industry perspectives provided in July 8 NEI letter to NRC**
  - **Further discussion needed on thresholds for NRC notification when closed ITAAC are compromised**

# Going Forward

- **Rulemaking on ITAAC Maintenance would be premature**
  - **Supplemental ITAAC notifications are consistent with ITAAC closure requirements**
    - **Sufficient to address in regulatory guidance**
  - **Need practical experience before codifying specific notification thresholds**



# Conclusion

- **Clear and workable ITAAC closure and maintenance processes are essential to achieve the goals of Part 52**
- **Significant progress to date; continue constructive interactions to resolve remaining issues**
- **Premature to consider rulemaking absent practical experience with process**