



PERIODIC BRIEFING ON NEW REACTOR ISSUES

Bill Borchardt

Executive Director for Operations

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Agenda

- New reactor program status
- Progress in resolving issues associated with Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Closure

Overview of New Reactor Program Status

Michael R. Johnson, Director
Office of New Reactors

Status

- Conducting thorough and timely reviews of Design Certification, Combined License, and Early Site Permit applications
- Substantial progress on safety reviews across all design centers
- Licensing process is working

Progress Since Last Briefing

Glenn M. Tracy, Director
Division of Construction Inspection
and Operational Programs

Progress Since Last Briefing

- Nine public workshops in FY 09
- July 8, 2009 NEI letter
- RG 1.215 on ITAAC Closure
- SECY-09-0119 on ITAAC
Maintenance

Construction Experience Update

- NRC Construction Experience Program
- Generic Communications
- Construction Experience Database
- International Activities

ITAAC Maintenance Overview

Mark Kowal, Branch Chief
Technical Specifications and
ITAAC Branch

Background

- SECY-08-0117 on ITAAC closure
- 2008 Commission meeting
- Two resulting SRMs – ITAAC closure and maintenance

ITAAC Closure Guidance

- RG 1.215 provides an acceptable approach for closing ITAAC
- Guidance developed in a public participatory process
- ACRS review

ITAAC Maintenance

- SECY-09-0119
- To maintain the validity of completed ITAAC
- ITAAC maintenance period
 - From the ITAAC closure letter until the 10 CFR 52.103(g) finding
- Addresses activities affecting closed ITAAC

Developmental Factors

- Part 52 is silent on ITAAC maintenance
- External stakeholder concerns
- Regulatory predictability and transparency
- Complete and accurate information

ITAAC Maintenance Approach

- Licensee programs are a key element
- Supplemental notifications
- Reporting thresholds
- Supplemental reporting threshold is the same threshold for 10 CFR 52.103(g)

ITAAC Maintenance

Richard Laura, Team Leader
Construction ITAAC Team
Technical Specifications and
ITAAC Branch

Licensee Programs

- ITAAC maintenance depends on the following programs
 - Problem Identification & Resolution
 - Engineering Change Process
 - Maintenance/Construction Process
 - Quality Assurance

New Supplemental Reports

- Supplemental ITAAC Closure Letters
- Component Replacement Letters
- ITAAC-All-Complete Letter

Threshold Development

- Draft thresholds address each sub-component of an ITAAC:
 - Inspections, Tests, Analyses
 - Acceptance Criteria
 - Design Commitment
 - Total ITAAC

Draft Threshold 1

- Post work verification (PWV)
 - An engineering justification is needed to demonstrate that the PWV is appropriate

Draft Threshold 2

- Engineering changes
 - An engineering change has been implemented to correct a design flaw that causes the acceptance criteria not to be met

Draft Threshold 3

- Population of SSCs and subcomponents
 - The number of SSCs or subcomponents related to a closed ITAAC has changed

Draft Threshold 4

- Complete and valid representation of the ITAAC
 - The ITAAC determination basis needs to be updated to be complete and accurate

Next Steps

- Develop additional examples for supplemental reporting thresholds
- Update RG 1.215
- Complete development of ITAAC closure verification process

Next Steps (continued)

- Develop design acceptance criteria closure process
- Engage stakeholders on ITAAC maintenance strategies for emergency preparedness and security

10 CFR 52.103(g) and 10 CFR Part 52 Revision

Nanette Gilles

Senior Policy Analyst

ITAAC Closure Working Group Member

Commission Finding per § 52.103(g)

- ITAAC “are met” if
 - All ITAAC were verified to be met at one time
 - Licensee provides confidence that ITAAC determination bases are maintained and ITAAC continue to be met

Commission Finding per § 52.103(g) (continued)

- Work on ITAAC SSCs at the time of the § 52.103(g) finding
- Confidence that ITAAC "are met" is based on
 - established licensee programs
 - supplemental reporting

Proposed Rulemaking

- Require supplemental ITAAC reporting
 - Supplemental ITAAC letters
 - Component replacement letters
 - ITAAC All-Complete letter
- Explain the basis for the reporting requirements

Acronyms

- ACRS – Advisory Committee on Reactor Safeguards
- ASME – American Society of Mechanical Engineers
- CFR – Code of Federal Regulations
- ITAAC – Inspections, Tests, Analyses, And Acceptance Criteria

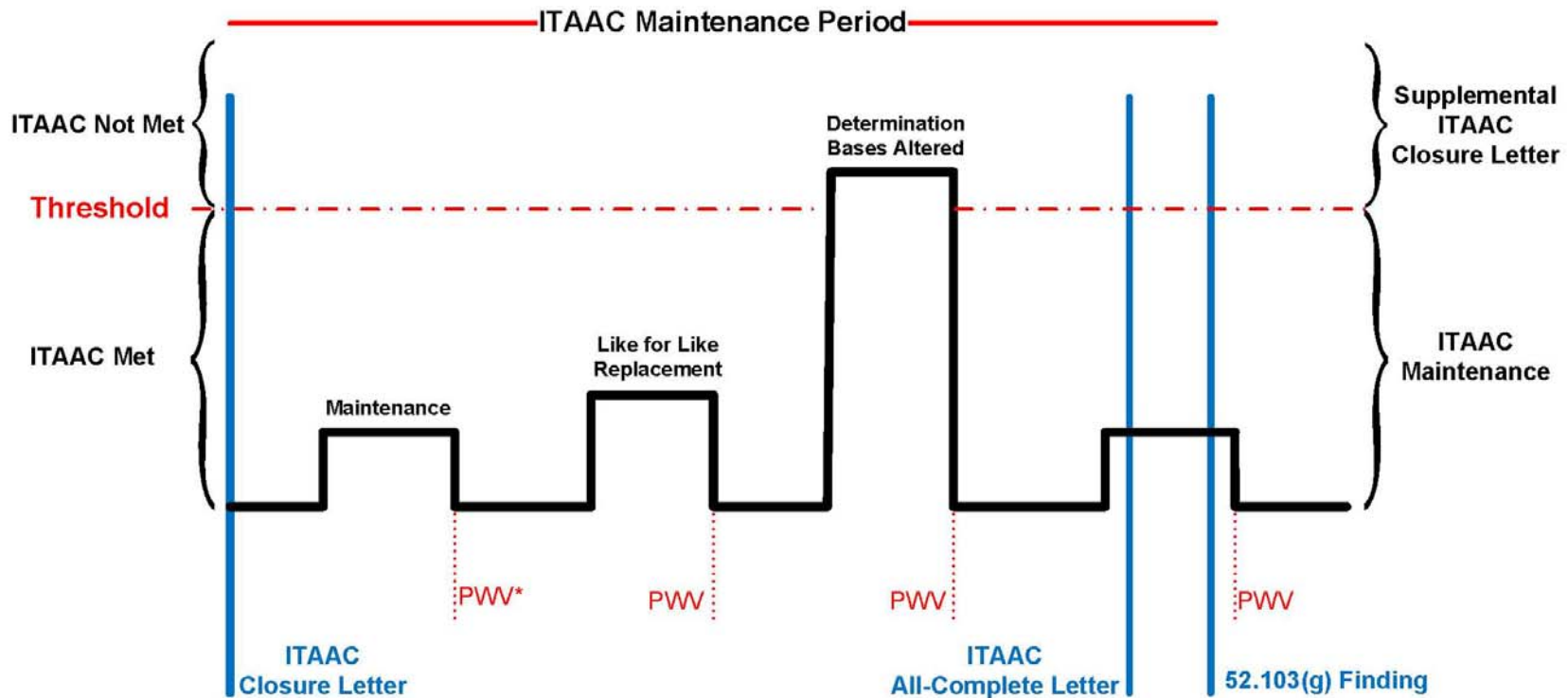
Acronyms (continued)

- NEI – Nuclear Energy Institute
- NRC – Nuclear Regulatory Commission
- PWV – Post Work Verification
- RG – Regulatory Guide
- SLC – Standby Liquid Control
- SRM – Staff Requirements Memorandum
- SSC – Structures, Systems, and Components

Background Slides

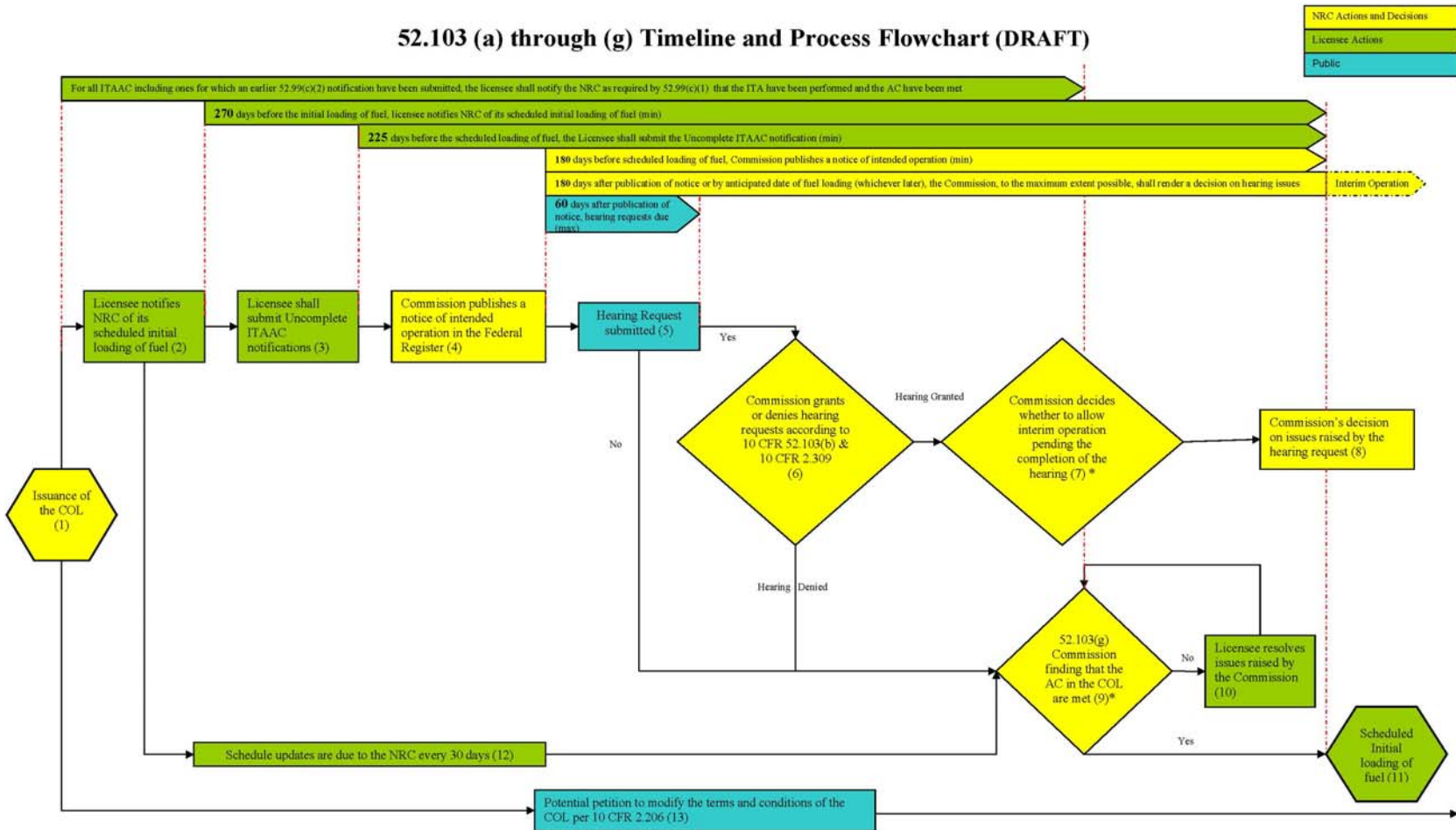
1. Depiction of Draft Approach
ITTAC Maintenance Notification
2. 52.103(a) through (g) Timeline
and Process Flowchart (DRAFT)

Depiction of Draft Approach ITAAC Maintenance Notification



* PWV: Post Work Verification

52.103 (a) through (g) Timeline and Process Flowchart (DRAFT)



* The chart does not yet reflect the interaction between the 52.103(g) finding and the interim operational finding.