SCE&G • Santee Cooper
Shaw • Westinghouse Electric Company

Licensee Perspective on ITAAC Completion Process

NRC Commission Briefing
August 30, 2011
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Topics

- Requirements for ITAAC Performance
- Utility's Role
- ITAAC Completion Process
- Transition to Operation
- CIP Task Force Efforts

Requirements for ITAAC Performance

- 10 CFR Part 52 – ITAAC provide reasonable assurance that the facility “has been constructed and will be operated in conformance with the License.”
- ITAAC originate from the COL, including those from the referenced DCD, and ESP (if applicable)
  - There are approximately 900 ITAAC per unit for V.C. Summer 2&3

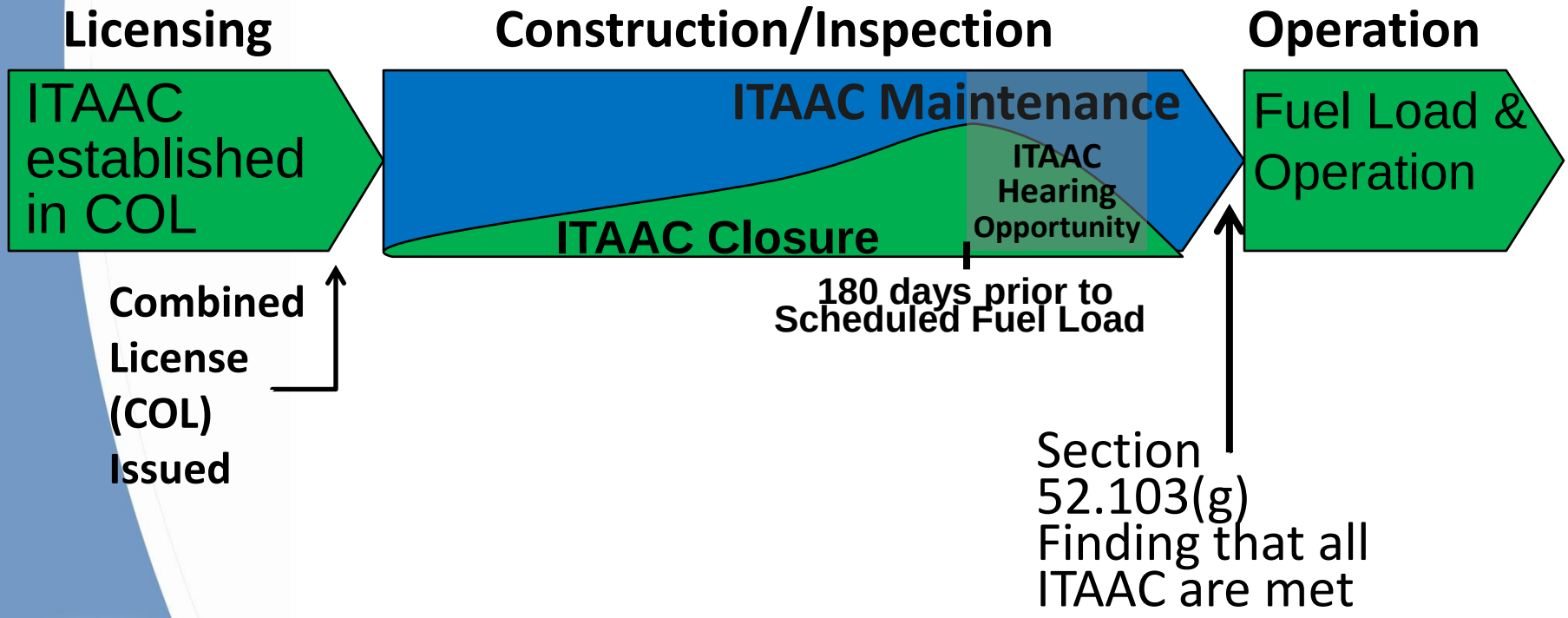
Requirements for ITAAC Performance

- The technical work for ITAAC completion is performed in accordance with normal work processes, requirements, and guidance:
  - 10 CFR 50 Appendix B
  - NRC Regulatory Guides
  - ASME Code Section III
  - ANSI, IEEE, AWS, ACI and other Industry Standards
  - Licensee Programs and Procedures

Utility's Role

- The licensee is ultimately responsible for all activities
  - Self-performance of some ITAAC (Emergency Planning, Physical Security Program)
  - Provide direct oversight of ITAAC performance by the Reactor Vendor and Constructor (Westinghouse/Shaw Consortium)
- The utility will be the primary interface to facilitate NRC Inspection of ITAAC activities under IMC-2503

ITAAC Completion Process

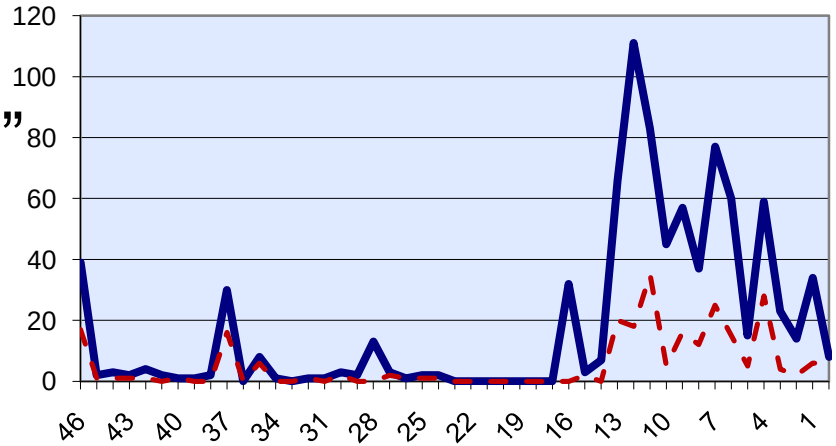


ITAAC Completion Process

- Inspections, Tests, and Analyses are performed in accordance with normal work processes
  - Not all ITAAC are safety-related, but all ITAAC are performed under the Licensee's QA program
  - Extra visibility is provided on ITAAC activities due to their regulatory significance
    - Identification on project schedules
    - Highlighted within construction work documents and pre-operational test procedures
    - Emphasized in procurement technical requirements

ITAAC Completion Process

- ITAAC Closure Notifications prepared in accordance with NEI 08-01 and RG 1.215
  - Work continues with the CIP Task Force to refine the ITAAC Closure process and develop additional examples
  - Planning to mitigate the expected “surge” in ITAAC Closure Notifications late in construction



ITAAC Completion Process

- The Staff has proposed new requirements for post-closure ITAAC notifications
  - Supplemental ITAAC closure notifications re: ITAAC Maintenance
  - All ITAAC Complete notification
- Consistent with NEI 08-01 (July 2010)
- NEI provided comments on the proposed rule and draft regulatory guide DG-1250

ITAAC Completion Process

- Licensee's programs will be used to maintain ITAAC (per NEI 08-01)
  - Problem Identification and Resolution
  - Construction/Maintenance
  - Configuration Control
  - Quality Assurance
- NRC Notification when:
  - Material error or omission in ITAAC Closure Notification
  - Design Change is implemented because the ITAAC acceptance criteria can no longer be met
  - Licensee activities materially affect the ITAAC Determination Basis

Transition to Operation

- All ITAAC are met. The as-built configuration of the plant is verified to meet the requirements of the COL
- Commission can make finding under 10 CFR 52.103(g) allowing fuel load and operation
- Additional clarity/regulatory guidance needed for requirements associated with interim operation under 10 CFR 52.103(c)

CIP Task Force Efforts

- Preparation of additional example ITAAC Closure Notifications to reduce uncertainty in the closure process
- Streamlining processes and clarifying expectations to assist with the surge in ITAAC Closure Notifications late in construction