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NRC Commission Briefing on ITAAC

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TOPICS

- Westinghouse Role in ITAAC Process
- Progress on Generic ITAAC Issues
- Application of Lessons Learned
- Standardization and the Fleet Approach

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Westinghouse Role in ITAAC Process

- Westinghouse/Shaw Consortium is the EPC provider for the complete AP1000® standard plant
- Consortium will complete all “Standard Plant” ITAAC under Licensees’ oversight
  - Planning
  - Status Tracking
  - Performance
  - Documentation
  - ITAAC Completion Package Preparation
  - Maintenance

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Generic ITAAC Issues – Steady Progress

- **2007** – New Rules on ITAAC Closure
- **2008** – NEI 08-01 ITAAC Closure Guidance
- **2010-11** – ITAAC Maintenance Guidance
- **2010-11** – ITAAC Closure & Verification Demonstration Project
- **2011-12** – Application of Lessons Learned

Industry Task Force coordinated by NEI
Working with NRC Staff

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ITAAC Demonstration Project

- Six AP1000 ITAAC selected to demonstrate the ITAAC Closure process
  - NRC Inspection of simulated performance of ITAAC activities
  - Licensee submittal of ITAAC closure letters
  - NRC verification of ITAAC closure
  - Examination of the surge in ITAAC closure letters late in construction
  - Identification and documentation of Lessons Learned

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ITAAC Demonstration Project – Lessons Learned

- Project was a very useful learning experience, identifying several opportunities for improvement
- Five main categories of Lessons Learned
  1. Roles/Interfaces: HQ, Region II CCI, Licensee
  2. Information Management Systems (Licensee and NRC)
  3. Resolve differing interpretations of ITAAC
     - Ongoing CIP Task Force Discussions
     - Update NEI 08-01 with additional guidance when necessary
  4. Assuring Sufficient Information in ITAAC Closure Letters
  5. Mitigate impact of ITAAC Surge

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Lesson Learned – Closure Letter Information

- Lesson – Different expectations on closure letter content for ITAAC without a similar NEI 08-01 example resulted in re-submittal of closure letters
- Goal - Provide additional confidence and certainty in the content of ITAAC closure letters
- Activity – "Expanded ITAAC Closure Notification Project"
  - Westinghouse/NEI will prepare approximately 30 additional example letters
  - More than 80% of AP1000 ITAAC will be represented
  - Letters reviewed with NRC staff at CIP Task Force Public Meetings
  - Letters added to NEI 08-01 after mutual NRC/NEI concurrence

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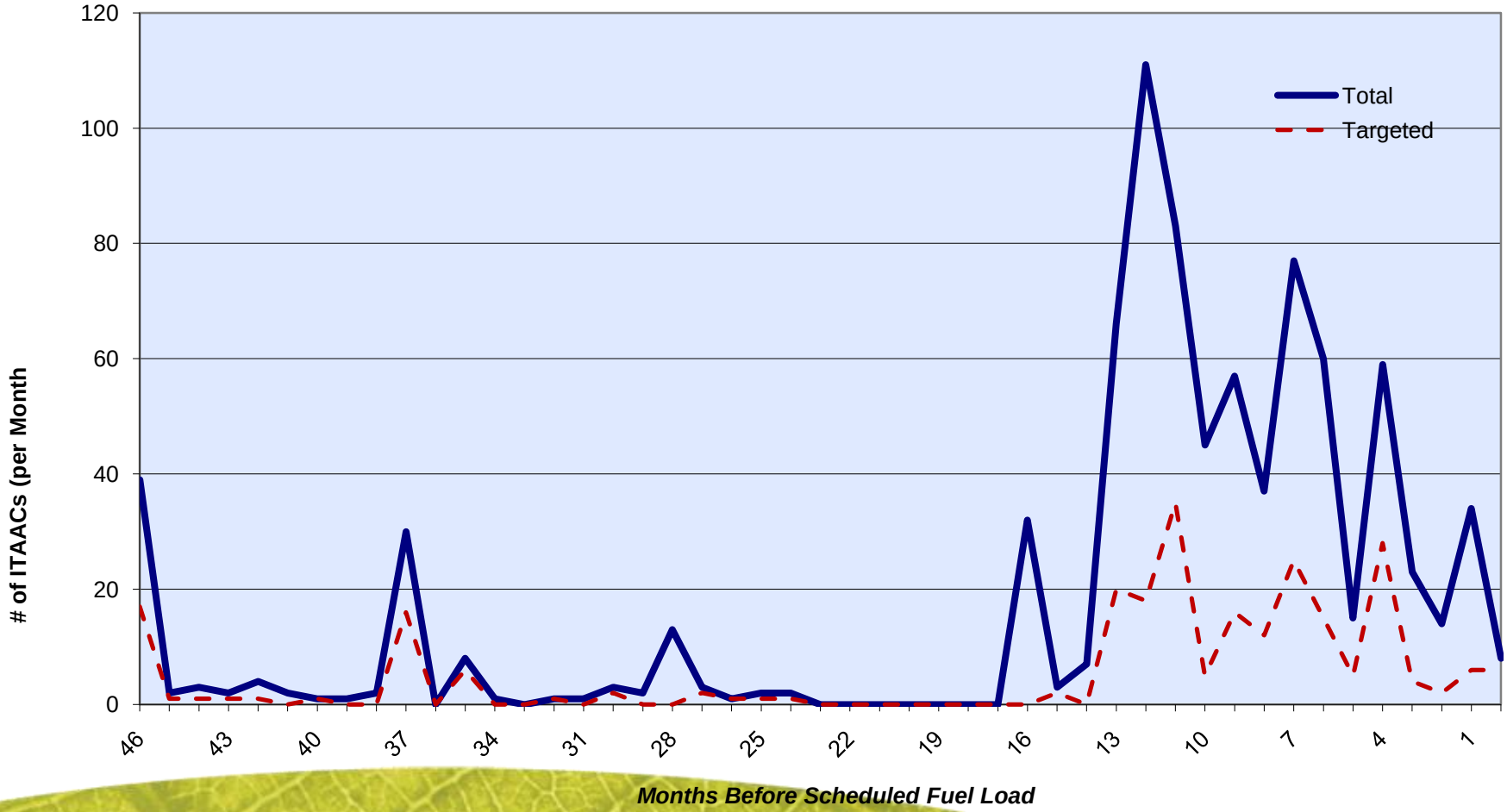
Lesson Learned – Forecast ITAAC Surge



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Lesson Learned – ITAAC Surge Mitigation

- Lesson – By their nature, ITAAC require verification of the as-built plant, and therefore most occur late in construction
- Goal – Mitigate the challenges associated with this surge
- Factors Identified During Demo Project
  - Work frequently occurs well in advance of Closure Letter submittal (Example: ASME ITAAC)
  - Many of the latest ITAAC are pre-operation tests, which involve a well understood process with significant NRC Inspector involvement
- Additional Activities In-Progress
  - Detailed planning for each ITAAC
  - Focus on process efficiency
  - Leverage CIP Task Force work to reduce process uncertainty

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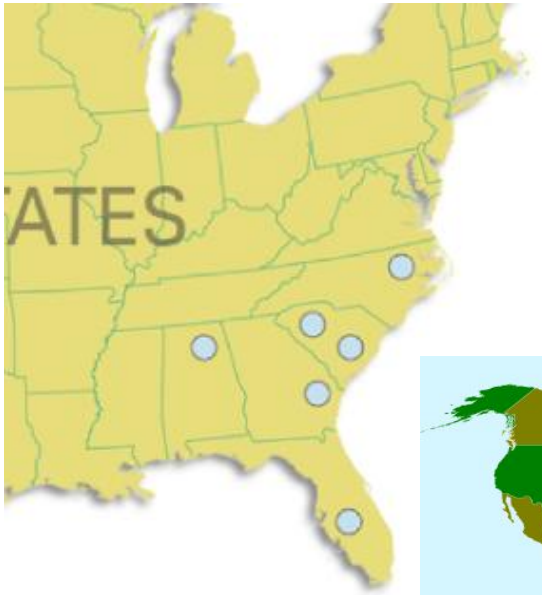
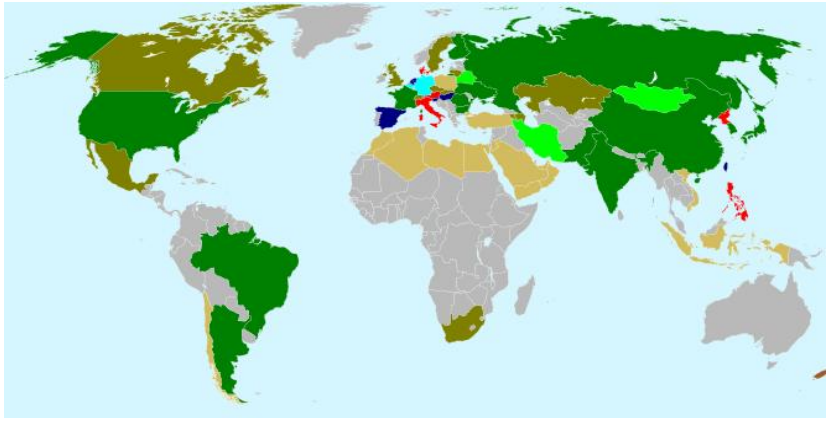
Standardization and the Fleet Approach

The vision is to identify and apply common activities to the entire AP1000 Fleet





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Standardization and the Fleet Approach

- ITAAC Closure Plans for each Standard Plant ITAAC

- Equipment Qualification applicable to all AP1000 units
  - Standard EQ Documentation Package used as basis for closing seismic and harsh environment qualification ITAAC for each unit

- First/First-3 of a Kind Pre-Operational Testing
  - Demonstration of key functional capabilities unique to AP1000
  - Apply stringent standard technical requirements to justify applicability to all units and regulatory frameworks

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