



U.S.NRC

UNITED STATES NUCLEAR REGULATORY COMMISSION

Protecting People and the Environment

ITAAC Closure Letter Guidance Development Workshop

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Workshop Objectives

- Provide an open atmosphere to discuss potential ITAAC closure guidance to licensees
- Determine the expected level of detail for licensee ITAAC closure letters and its supporting documents
- Determine the expected format for ITAAC closure letters
- NRC staff to issue guidance on ITAAC closure by December 2008



New Regulatory Basis 52.99

(Approved by the Commission, and published August 28, 2007)

- (c)(1) The licensee shall notify the NRC that the prescribed inspections, tests, and analyses have been performed and that the prescribed acceptance criteria have been met. **The notification must contain sufficient information to demonstrate that the prescribed inspections, tests, and analyses have been performed and that the prescribed acceptance criteria have been met.**



New Regulatory Basis 52.99

(Approved by the Commission, and published August 28, 2007)

- (c)(2) If the licensee has not provided, by the date 225 days before the scheduled date for initial loading of fuel, the notification required by paragraph (c)(1) of this section for all ITAAC, then the licensee shall notify the NRC that the prescribed inspections, tests, or analyses for all uncompleted ITAAC will be performed and that the prescribed acceptance criteria will be met prior to operation. **The notification must be provided no later than the date 225 days before the scheduled date for initial loading of fuel, and must provide sufficient information to demonstrate that the prescribed inspections, tests, or analyses will be performed and the prescribed acceptance criteria for the uncompleted ITAAC will be met, including, but not limited to, a description of the specific procedures and analytical methods to be used for performing the prescribed inspections, tests, and analyses and determining that the prescribed acceptance criteria have been met.**



Previous Workshops on ITAAC Closure

Public meetings and workshops include May 4 2005, Sept. 21 2005, and Jan. 23 2007.

Discussions included:

- Consistent terminology for CIP
- ITAAC matrices and families
- ITAAC closure
- Licensee performance assessment



ITAAC Example Selection Criteria

- Examples include two ITAAC from AP1000.
 - ITAAC 2.3.4 (4)
 - ITAAC 2.3.6 (2b)
- Both a simple ITAAC and a moderately intricate ITAAC were chosen.
- Thought process is to work through simple and moderate ITAAC before trying to tackle ones with high-level of difficulty.



AP1000 ITAAC 2.3.4 (4)

Design Commitment

The FPS provides for manual fire fighting capability in plant areas containing safety-related equipment.

Inspections, Tests, Analyses

- i) Inspection of the passive containment cooling system (PCS) storage tank will be performed.
- ii) Testing will be performed by measuring the water flow rate as it is simultaneously discharged from the two highest fire-hose stations and when the water for the fire is supplied from the PCS storage tank.

Acceptance Criteria

- i) The volume of the PCS tank above the standpipe feeding the FPS and below the overflow is at least 18,000 gal.
- ii) Water is simultaneously discharged from each of the two highest fire-hose stations and not less than 75 gpm.



AP1000 ITAAC 2.3.6 (2b)

Design Commitment

The piping identified in Table 2.3.6-2 as ASME Code Section III is designed and constructed in accordance with ASME Code Section III requirements.

Inspections, Tests, Analyses

Inspection will be conducted of the as-built piping as documented in the ASME design reports.

Acceptance Criteria

The ASME Code Section III design reports exist for the as-built piping identified in Table 2.3.6-2 as ASME Code Section III.



Conclusions, Recommendations, and Comments

- Alignment on closure letter expectations
- NRC would appreciate detailed feedback on the ITAAC workshop and its proposals
- Compile topics for next workshop