



“Report” ITAAC Update

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Andrea Johnson
Reactor Operations Engineer
NRO/DCIP/CIPB

“Report” ITAAC Effort

- ▶ Objective:

- Develop standard report content, where appropriate, that promotes consistent format and technical content that will result in efficient NRC report reviews.

- ▶ Background:

- The simulated ITAAC Closure and Verification Demonstration noted that significant differences in the expected level of detail included in the reports exist. Therefore, it may be beneficial to develop a consistent format and content for reports used to justify ITAAC closure.
- Promote consistent NRC reviews
- Aid in planning ITAAC inspections.

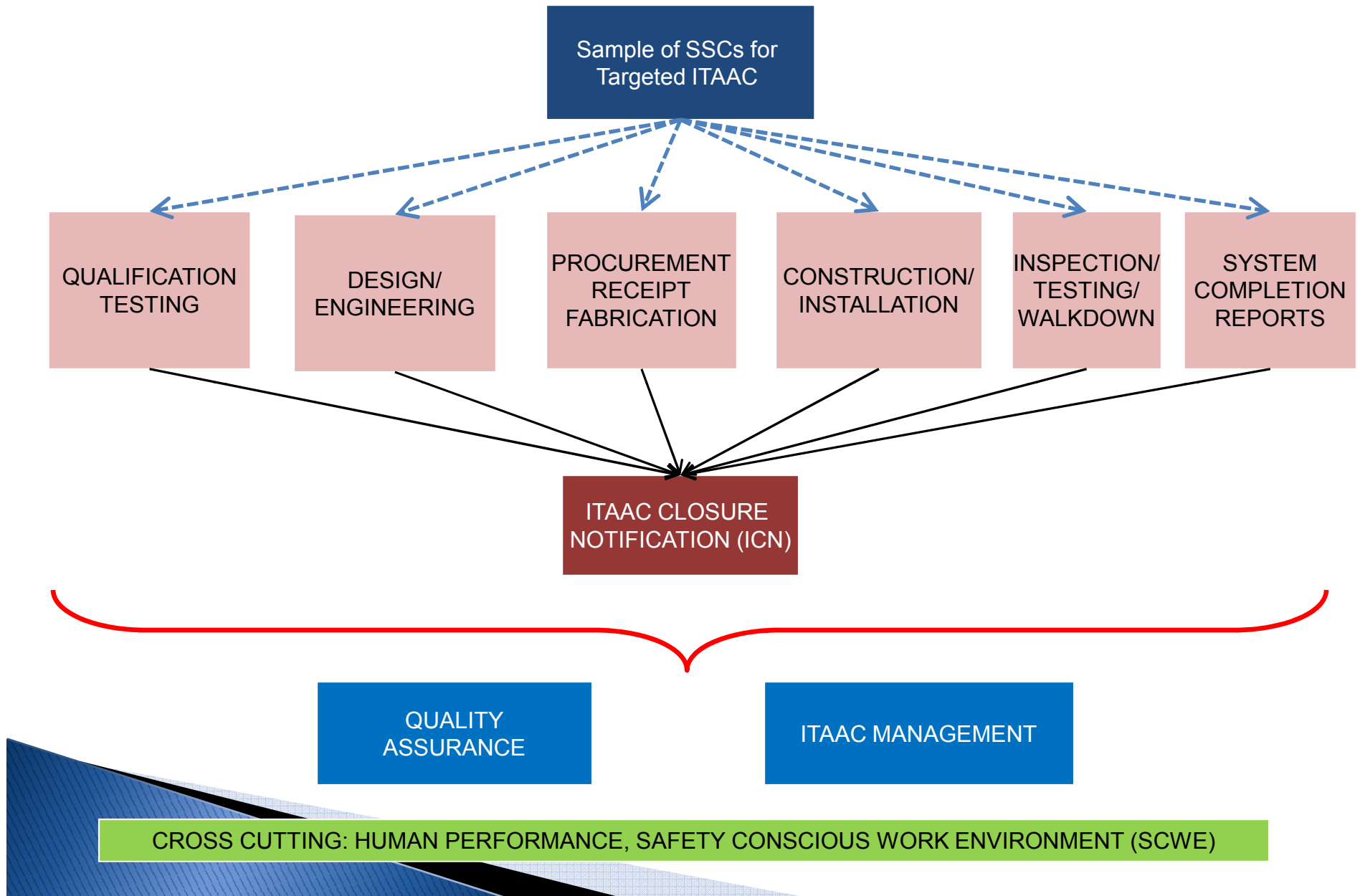
What are “Report” ITAAC?

- ▶ ITAAC that rely on a technical report in order to meet their acceptance criteria, e.g.:
 - A report exists and concludes...
 - A stress report exists...
 - A test report exists...
 - An analysis report exists and concludes...
 - Exist in all Part 52 new reactor designs under review

Inspection Objectives

- ▶ Verification of quality assurance processes (procurement, testing, analysis, data/record management, etc.) and other support activities conducted to develop and produce the Report
- ▶ Physically confirm (when possible) process attributes, and not focus solely on inspection of documentation
- ▶ Verification of technical attributes within the Report

Inspection Approach



Example Scenario

- ▶ From DCD Tier 1 (ITAAC 2.2.1–3 (2.a)):

<i>Design Commitment</i>	<i>ITA</i>	<i>AC</i>
<i>2.a) The components identified in Table 2.2.1–1 as ASME Code Section III are designed and constructed in accordance with ASME Code Section III requirements.</i>	<i>Inspection will be conducted of the as-built components as documented in the ASME design reports.</i>	<i>The ASME Code Section III design reports exist for the as-built components identified in Table 2.2.1–1 as ASME Code Section III.</i>

- ▶ The design commitment is that the component (e.g. Containment Vessel CNS–MV–01) is designed and constructed per Code. NRC inspection of this will be multi-part, as follows:
 - Part 1 – Inspection of the various processes used to construct the Containment Vessel, ultimately documented in the Containment Vessel Code Data Report (RII/CCI).
 - Part 2 – Inspection of the Containment Vessel Design Report (when available) to ensure Code limits are not exceeded and to verify selected attributes* within the Design Report (NRO).
 - Part 3 – Inspection of the Design Report, focusing on sampling reconciliation documentation of as-built changes as the Containment Vessel was constructed (NRO and RII/CCI).
- * The extent of this verification may depend on the level of design changes undertaken by the licensee.

Path Forward

- ▶ Proposed
 - Provide list to stakeholders
 - Obtain agreement to proceed with stakeholders
 - Complete grouping of reports
 - Develop report content/guidance
 - Continue public discussion on guidance/sample reports
- ▶ Continue development of ISG-024 and all of its appendices (supplemental guidance for the verification of “complex” ITAAC)

