

ITAAC Closure Verification Process (ICVP) – Potential Material Concern

Construction Inspection Program Category 3 Public Meeting

May 9, 2013

Basis for Presentation

- Staff presented the ITAAC Closure Verification Process (ICVP) in a public meeting on February 07, 2013 (ML13037A196)
- Subsequently, industry had questions on how a potential material concern during an ICN review was administered
- This presentation addresses those questions



NRC ICN Review Outcomes



- **ICN does not have sufficient information**
- **A potential material concern is identified**
- **ITAAC verified successfully completed**



Material Concern

- If the concern is not legitimate, the NRC will continue ICN review as planned
- For a legitimate material concern, the NRC project manager will notify the licensee by letter
- The concern could be an incorrect standard used for a calculation, improper welds in the field, or flow rate less than required
- Licensee is made aware of the concern

Material Concern (cont)

- Region II may perform inspections and may confirm an ITAAC Finding.
- The licensee makes the required corrective actions and submits a new ICN of record
- The ICVP is initiated for the new ICN, and the original ICN is superseded
- If Region II determines there is no ITAAC finding, ICN is treated as having insufficient information to properly address the concern

Hypothetical Example 1

Interrupt DC Fault Current

- Potentially, the fault current of a charger was not included in the calculation for a battery distribution panel
- NRC reviewed the concern and determined that it was legitimate
- NRC project manager sends a letter to the licensee informing them of the issue
- Licensee understands the concern



Hypothetical Example 1 (cont.)

Interrupt DC Fault Current

- Region II performs inspections and determines there is an ITAAC Finding
- The licensee performs new calculations that includes charger fault contribution and resizes DC breaker for a new interrupting rating
- Licensee submits a new ICN for this ITAAC



Hypothetical Example 2

Hydrostatic Testing

- A crack was discovered in a piping line of a system after a hydrostatic test. The licensee ground down the wall of the piping to remove the crack, and deemed it sufficient for its safety function. Later on the piping line was checked again, and the licensee noted that the wall of the piping line was too thin for its stated design pressure
- NRC determines that the issue is a valid concern

Hypothetical Example 2 (cont.)

Hydrostatic Testing

- NRC project manager sends a letter to the licensee informing them of the issue
- Licensee understands the concern
- Region II finds that the pipe thickness is too thin for the design pressure and declares an ITAAC finding
- Licensee replaces the piping line and performs a new hydrostatic test with acceptable results
- Licensee submits new ICN for this ITAAC