

NEI 08-01 Review

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Background

- NEI submitted NEI 08-01 Revision 4, “Industry Guideline for the ITAAC Closure Process Under 10 CFR 52” on February 1, 2012
- NRC endorsed Revision 4 with Regulatory Guide 1.215, “Guidance for ITAAC Closure Under 10 CFR Part 52,” in May 2012

Background

- Submitted NEI 08-01 Draft Revision 5, on February 1, 2012
- NRC provided comments to NEI in March, May, and August 2012
- Public Meetings in May and August 2012

NEI 08-01 Revision 5C

- Submitted Revision 5C on January 23, 2013
- ICN Letter Examples (Appendix D) discussed at April 10, 2013 public meeting
- Comments on Revision 5C sent to NEI on April 12, 2013 (MLXXXXXXXXXX)

Level of Detail

- April 10, 2013 meeting reinforced level of detail expectations for ITAAC Closure Notifications (ICNs)
- Therefore level of detail for ICNs should be sufficient to accommodate both the ICN and uncompleted ITAAC notifications (UINs). Specifically, the staff concludes that the example ICNs will meet the specific procedures and analytical methods standard of 10 CFR 52.99(c)(3).

225 Day Letter

- NEI proposes to use present tense for the UINs (Section 7)
- Does not distinguish what activities have has been performed versus what will be performed

225 Day Letter (cont)

- Present tense acceptable
 - For the sake of clarity, the letter should state that plans for completing the ITAAC are consistent with activities actually performed, but that the letter does not identify which activities have been completed
 - Plan for completing ITAAC cannot be inconsistent with actions already taken
 - Exception: multiple methods might be used to complete the ITAAC, the choice of method to be used depends on events outside the control of the licensee, and only one method was used in completing the ITAAC.

NRC Comments

Next Steps

- Possible future meetings to continue topics of interest
- NEI submits Revision 5
- NRC endorses in Revision 2 of RG 1.215