

Number	Comment	Explanation
1.0	On page 2, add “All ITAAC Complete Notification” to the list at the bottom and also list guidance for the content of ITAAC Post Closure Notifications.	This is editorial and does not affect the staff’s ability to endorse NEI 08-01.
3.0	On page 6, 1 st paragraph: The title of the SRP section should not be abbreviated; it should be “Inspections, Tests, Analyses, and Acceptance Criteria.”	This is editorial and does not affect the staff’s ability to endorse NEI 08-01.
3.1	On page 7, 3 rd paragraph: 1 st line, revise “NRC” to “the NRC”. (Was comment 3.2)	This is editorial and does not affect the staff’s ability to endorse NEI 08-01.
3.2	On page 11, first full paragraph—Change to read as follows: The NRC may, if necessary, delay its closure verification for a non-targeted ITAAC until at least some ITAAC inspections have been completed for targeted ITAAC in a particular ITAAC family to confirm that the licensee’s performance within that ITAAC family is satisfactory.	This is editorial and does not affect the staff’s ability to endorse NEI 08-01.
3.3	On page 11, second full paragraph, first sentence –Change to read as follows: After verifying that the prescribed inspections, tests, and analyses in the ITAAC have been performed and the acceptance criteria met, the NRC will issue notices of its verification of the successful completion of those inspections, tests, and analyses “at appropriate intervals.”	This is editorial and does not affect the staff’s ability to endorse NEI 08-01.
3.4	On page 11, third full paragraph, second sentence—Change to read as follows: If the NRC verifies after an ITAAC Closure Notification has been submitted that an ITAAC was, in fact, not met, the licensee would be subject to an ITAAC Finding if verified by subsequent NRC inspections.	This is editorial and does not affect the staff’s ability to endorse NEI 08-01.
4.0	On page 22, sentence above 4.1, there are 2 words “in.”	This is editorial and does not affect the staff’s ability to endorse NEI 08-01.
5.0	On page 26, first two lines—Change to read as follows: Completion Packages is available to support efficient NRC ITAAC inspections .	This is editorial and does not affect the staff’s ability to endorse NEI 08-01.
6.0	On page 27, second full paragraph, fifth sentence—Change to read as follows: The ICN should also be written with the expectation that the reader is someone who is appropriately informed about and familiar with applicable NRC regulations, licensing requirements and technical and/or engineering concepts related to ITAAC.	This is editorial and does not affect the staff’s ability to endorse NEI 08-01.

7.0	On page 29, 1 st paragraph in Section 7.0, last sentence: Recommend removing the sentence because the validity of this sentence depends on the timing of the issuance of the notice of intended operation.	Staff may add a clarification on the timing of the notice of intended operation to RG 1.215.
7.1	On page 30, 4 th paragraph, 2 nd sentence: “To illustrate the use of the template for ITAAC-specific attachments, an example of an Uncompleted ITAAC Notifications for specific...” Remove the “s” after Notifications.	This is editorial and does not affect the staff’s ability to endorse NEI 08-01.
8.0	On page 33, paragraph above Section 8.2: ITAAC are only in effect until fuel load so this needs to be taken into account. (This was NRC staff comment 8.1 in a previous round of comments – industry stated they modified the paragraph, but the paragraph was not modified). Please add as proposed in Attachment 2 to the July 18, 2013, NEI 08-01, Revision 5 submittal: <u>To support the Section 52.103(g) finding</u> , the licensee is responsible.....	This is editorial and does not affect the staff’s ability to endorse NEI 08-01.
9.0	On page 39, top of the page, it appears that the following sentence was removed from the previous version, “In these cases, the ITAAC should specify that system tests were performed at other than the final installed location.” The staff believes that the sentence should be restored, and revised as, “In these cases, the ICN should specify that system tests were performed at other than the final installed location.”	After further consideration, the staff has determined that the language in Section 9.1 is sufficient as is. Section 9.7 covers cases where system tests were performed at other than the final location and the plant design did not specifically provide for testing to be performed at a module fabrication or other manufacturing facility.
D-1	<p>On page D1-1 in the ITAAC Determination Basis—After the first sentence, add the following sentence: For partial submittals, it will be stated here what portions of the ITAAC were completed.</p> <p>On page D1-2 in the ITAAC Determination Basis, first partial paragraph, second sentence—Change as follows: If there are multiple ITAAC associated with a given Design Commitment, licensees should so state and should identify the specific purpose and scope of the particular ITAAC that was closed by the licensee.</p> <p>On page D1-2 in Determination Basis, fourth full paragraph, last sentence.—After the last sentence add the following: For partial ICNs, there will be no concluding statement until the final ICN covering the entire ITAAC is submitted.</p>	<p>Not necessary, since this template is for a complete ICN, not a partial ICN. Sufficient guidance on partial ICNs is given elsewhere.</p> <p>This is editorial and does not affect the staff’s ability to endorse NEI 08-01.</p> <p>Not necessary, since this template is for a complete ICN, not a partial ICN. Sufficient guidance on partial ICNs</p>

	<p>On page D1-3 in the ITAAC Finding Review section, third sentence—Change to read as follows: Alternatively, the ICN will provide a justification for why the NRC may issue its Section 52.99 determination of successful ITAAC completion despite the existence of uncompleted corrective actions.</p> <p>On page D1-3, last sentence in the ITAAC Completion Statement--- Add the following sentence after the last sentence: This will not be required in a partial ICN.</p> <p>On page D1-4, under References—Change item 3 as follows: Relevant inspection or test or analysis procedure.</p> <p>On page D1-4, under References—Add item 5 as follows: Relevant ICN for another associated ITAAC.</p>	<p>is given elsewhere.</p> <p>This is editorial and does not affect the staff's ability to endorse NEI 08-01.</p> <p>Not necessary, since this template is for a complete ICN, not a partial ICN. Sufficient guidance on partial ICNs is given elsewhere.</p> <p>Staff will add clarification to RG 1.215.</p> <p>Not necessary, since unless the ICN a references a different ICN, there are no other relevant ICNs. The identification of a relevant ICN in the references section is a situation-specific matter that need not be addressed in the general template.</p>
D-2	<p>On page D2-1, this ICN is composed of thirteen ITAAC (numbers 799 – 811 in the Vogtle and Summer COLs), for which separate ICNs must be submitted to the NRC. Please revise this ICN to only show one of the thirteen ITAAC which are incorporated in this example.</p>	<p>The staff is unable to endorse this ICN example as written. Section 6.0 specifies that “an ICN is required for each individual ITAAC”; therefore, one ICN needs to be written for one of the ITAAC contained within this example. In addition, the Determination Basis does not adequately specify how the Acceptance Criteria were met, specifically, the numerical distances. In the template D-1, it states that “for those ITAAC where the acceptance criteria</p>

	<p>On page D2-3, 4th paragraph under “ITAAC Determination Basis”: “Raceway completion and cable route were validated....”</p> <p>On page D2-4, 2nd paragraph: “Those separation distances less than those specified by the ITAAC criteria and not provided with enclosed raceways or barriers have been analyzed and determined to be satisfactory. The Cable Separation Final Report (Reference 3) is available for NRC inspection at the {Licensee} site.”</p>	<p>contain a numerical value(s), the IDB should provide the numerical results”; this example does not contain this level of detail.</p> <p>This is editorial and does not affect the staff’s ability to endorse NEI 08-01.</p> <p>This is editorial and does not affect the staff’s ability to endorse NEI 08-01.</p>
D-3	<p>On page D3-1, Subject line should state “Completion of {Site Name and Unit #}” consistent with most of the other ICNs. When the licenses are issued, the ITAAC will be contained in an appendix to the COL, which is the appropriate reference in an ICN since it is possible that the site-specific ITAAC could represent a departure from the DCD ITAAC. To the extent that industry wishes to identify the ITAAC in the ICN example as coming from a particular technology, the Appendix D-3 header already performs this function. This is a generic comment for ICNs that identify vendor technology in the subject line.</p> <p>On page D3-1, ITAAC Determination Basis, first paragraph, second sentence: Why is ASTM E119 identified as (Reference 2) when it is not listed in the references?</p> <p>Page D3-1, end of first paragraph and beginning of 2nd paragraph discusses a “nationally recognized testing laboratory (NRTL), but does not specify which laboratory and therefore, the NRC is not sure what listed and design requirements are being referenced.</p>	<p>Staff will add a clarification to RG 1.215.</p> <p>This is editorial and does not affect the staff’s ability to endorse NEI 08-01.</p> <p>Not necessary, since individuals familiar with this topic would understand the associated NRTLs for this ITAAC.</p>
D-4	<p>On page D4-2, 1st paragraph, 2nd sentence: Revise to state “The tests were designed to verify that each of the two CAMS Class 1E radiation monitoring channels in each of the two divisions met the design commitments.”</p> <p>On page D4-2, 2nd paragraph, 2nd sentence: Revise to state “The design and installation of CAMS related equipment maintained the independence in accordance with Regulatory Guide 1.75 (Reference 4) as identified...”</p>	<p>This is editorial and does not affect the staff’s ability to endorse NEI 08-01.</p> <p>Not necessary, since the ICN states that the ITAAC was complete using Regulatory Guide 1.75.</p>

	<p>On page D4-2, 3rd paragraph from the bottom states “Cable routing within cabinets was...” Can the ICN discuss the relationship between the cabinet, divisions and channels? How many cabinets make up a division and/or how many channels are in a division?</p> <p>On page D4-2, why is there no reference to electrical isolation as stated in the ITAAC 3b? If electrical isolation was not required, it should be so stated.</p>	<p>Not necessary, since the relationship is adequately described in the ICN.</p> <p>Not necessary, since ITAAC was completed using physical separation.</p>
D-5	<p>On page D5-2, in the 3rd bullet, spell out SRV.</p> <p>On page D5-2, why does the ITAAC Determination Basis not define what is Class 1, 2, and 3 piping?</p> <p>On page D5-2, is the specificity offered in this ICN for ASME references consistent with other ICN examples?</p>	<p>This is editorial and does not affect the staff’s ability to endorse NEI 08-01.</p> <p>Not necessary, since individuals familiar with this topic would understand the definition of Class 1, 2, and 3 piping.</p> <p>Not necessary, because citing the specific ASME section is not necessary; however, it could be beneficial, as a reference for the staff, for the ICN to cite the specific ASME Code section.</p>
D-6	<p>Page D6-3, References: Global comment – the numbers should not be italicized.</p>	<p>This is editorial and does not affect the staff’s ability to endorse NEI 08-01.</p>
D-7	<p>On page D7-1, “ITAAC Determination Basis”, 2nd sentence: “This ITAAC was completed when the piping identified in Table 2.1.2-2 (Attachment A), which is encompassed within the respective piping system(s) Code Symbol N-Stamp and the corresponding piping system(s) Code N-5 Data Report Form(s) ABC (Reference 2), was completed.” This seems to indicate that the piping was completed, please revise to say “installed.”</p> <p>On page D7-1, ITAAC Determination Basis, 3rd sentence: Are all these type of NDE tests conducted for each weld or only some of them?</p>	<p>This is editorial and does not affect the staff’s ability to endorse NEI 08-01.</p> <p>Not necessary, since the ASME Code specifies which types of NDE are needed for pressure boundary welds.</p>
D-8	<p>Under “ITAAC Determination Basis,” please specify if the</p>	<p>Not necessary, since the</p>

	<p>methodology was approved by the NRC.</p> <p>On page D8-2, why is it not stated here what is meant by loop inaccuracies, response testing, and maintenance or replacement of instrumentation in regard to the methodology for determining setpoints?</p> <p>References are incorrect in the 1st full paragraph on page D8-2.</p>	<p>methodology is in accordance with the ANSI standard.</p> <p>Not necessary, since the referenced ANSI standard defines these terms.</p> <p>The staff is unable to endorse this ICN example as written. There are several instances where the explanation of the method for completing the ITAAC consists of referring to a reference number, where the reference is clearly incorrect. For example, on page D8-2, the first full paragraph, contains Reference 1, as one of the references for the inspections for the PMS setpoints and calculating instrument and loop uncertainty setpoints. However, Reference 1 is NEI 08-01, and therefore the ICN incorrectly refers to the appropriate references. Such errors would not allow the NRC staff to complete its verification review.</p>
D-9	<p>Under "ITAAC Determination Basis," specify the number of locations/structures which were inspected?</p> <p>On page D9-2, ITAAC Determination Basis, fifth paragraph, first sentence: Should not the codes and standards referred to here be stated and referenced?</p>	<p>Not necessary, since the ITAAC deals with the ability of the structures to withstand design basis loads and not the measurement of the thickness.</p> <p>This is editorial and does not affect the staff's ability to endorse NEI 08-01.</p>
D-10	<p>On page D10-2, 2nd paragraph: Twice the paragraph says "quality program", should this not state "quality assurance</p>	<p>This is editorial and does not affect the staff's</p>

	<p>program”?</p> <p>On page D10-2, ITAAC Determination Basis - Why is there no mention here of the fact that this ITAAC verifies that there are controls for the design of both safety related and non-safety related SSCs in accordance with the QA programs of each?</p>	<p>ability to endorse NEI 08-01.</p> <p>Not necessary, since the ICN does discuss the controls for the design of safety and non-safety related SSCs.</p>
D-12	<p>Under “ITAAC Statement,” where is the Design Commitment?</p> <p>On page D12-3 for ITAAC 2.3-1.8.1.5 under “Results”—Why does the result state that backup power supply was tested when this ITAAC is only for an inspection?</p> <p>On page D12-3, last sentence: Should not say “Offsite Support Center,” but should say “onsite operations support center?”</p>	<p>This is editorial and does not affect the staff’s ability to endorse NEI 08-01, EP ITAAC are written differently.</p> <p>Not necessary, because the licensee’s activities encompassed the required inspection and ensured that the backup power supply was available as required by the acceptance criteria.</p> <p>The staff is unable to endorse this ICN example as written. The ITAAC describes the emergency facilities as being onsite; however, the conclusion statement for the ICN stating that the acceptance criteria were met discusses an offsite facility.</p>
D-13	<p>On page D13-1, in purpose paragraph: Spell out GDCS.</p> <p>On page D13-1, ITAAC Determination Basis: Spell out RPV.</p> <p>On page D13-2, first paragraph, 2nd sentence –This ITAAC is for testing however it is stated that visual checks were made which is an inspection. What is the testing element of this ITAAC?</p> <p>On page D13-2, ITAAC Finding Review: Global comment, be consistent with “This review identified X ITAAC findings, listed below: The “X” should be written as{X}.</p>	<p>These are editorial and do not affect the staff’s ability to endorse NEI 08-01.</p> <p>Not necessary, since the visual check was necessary to complete the test and verify the acceptance criteria.</p> <p>This is editorial and does not affect the staff’s ability to endorse NEI 08-01.</p>
D-15	<p>Under ITA and Acceptance Criteria, need to specify, not just reference, Tier 1 information.</p>	<p>It is not necessary to address any of these</p>

	<p>Under "ITAAC Determination Basis," you need to summarize the methodology used, and the results.</p> <p>On page D15-1, ITAAC Determination Basis – Would it not be better to have chosen ITAAC Item 7 of Table 2.2.1-3 to show the ICN for containment isolation instead of the ICN for reference ITAAC Item 8.a of Table 2.2.3-4 (from the Subject line)?</p>	<p>comments because this is a reference ITAAC, and the completion of the referenced ITAAC is all that is required.</p>
D-16	<p>On page D16-1, ITAAC Determination Basis, first sentence—Why does this sentence refer to ITAAC Table 2.3.3-2 instead of ITAAC Table 2.1.1-2 (from Subject line)?</p> <p>On page D16-2, 2nd paragraph: Revise the sentence to add the preposition "of" "{Licensee} Procedure XYZ, <i>Material Receipt</i>, (Reference 3), establishes and governs the process used for performing and documenting receipt inspections of components such as the RPV delivered to the site."</p> <p>On page D16-2, since inspections were at a vendor location instead of the as-built location, why is there no technical justification provided in the ICN or a reference in the ICN to a standard technical justification in NEI 08-01?</p>	<p>The staff is unable to endorse this ICN example as written. The Determination Basis refers to Tier 1 Table 2.3.3-2, which does not exist and which is not the correct reference to find the key dimensions and acceptable variations of the as-built RPV. The Determination Basis should refer to the Table 2.1.1-2.</p> <p>The staff is unable to endorse this ICN example as written. The sentence without the word "of" creates confusion to the staff and the intent of the sentence would not necessarily be clear to a reasonable person.</p> <p>The staff is unable to endorse this ICN example as written. Page 38 of the NEI guidance (Section 9) states "The ITAAC Completion Package and the ITAAC Closure Notification description of as-built ITA performed on SSCs at other than the final installed location should identify <u>the applicable generic technical justification(s) provided in Sections 9.1</u></p>

		- 9.6.” This ICN does not identify the applicable technical justification, while Example D-100 does.
D-17	On page D17-2, since inspections were at a vendor location instead of the as-built location, why is there no technical justification provided in the ICN or a reference in the ICN to a standard technical justification in NEI 08-01?	The staff is unable to endorse this ICN example as written. Page 38 of the NEI guidance (Section 9) states “The ITAAC Completion Package and the ITAAC Closure Notification description of as-built ITA performed on SSCs at other than the final installed location should identify <u>the applicable generic technical justification(s) provided in Sections 9.1 - 9.6.</u> ” This ICN does not identify the applicable technical justification, while Example D-100 does.
D-18	On page D18-1, ITAAC Determination Basis, the 1 st sentence says “engineering”; is this the department or does it mean something else?	This is editorial and does not affect the staff’s ability to endorse NEI 08-01.
D-21	Under “ITAAC Determination Basis,” discuss what tasks are necessary.	The staff is unable to endorse this ICN example as written. The ICN states that the procedure addresses tasks which are performed to determine that adequate security facilities and equipment support the Security Plan. In order for the NRC staff to complete its verification review, the ICN needs to be revised to discuss what tasks are necessary to perform the ITA.
D-28	Under the purpose paragraph: Global comment, when referring to a Table, it should not be to the DCD but to the COL.	Staff will add a clarification to RG 1.215.

	<p>Under "ITAAC Determination Basis," specify the pressure and the results of the hydrostatic testing, possibly in a table.</p> <p>On page D28-2, under "ITAAC Determination Basis," 1st paragraph: Are the N-5 Data Reports part of the ASME Code report?</p> <p>On page D28-2, under "ITAAC Determination Basis," 2nd paragraph: What is the difference between the purpose of the Code Data Report (Reference 2) and the Hydrostatic Testing Report for each ASME component? The difference should be stated and the purpose of each indicated.</p> <p>On page D28-2, under "ITAAC Determination Basis," 2nd paragraph: Last sentence says "The pressure testing (hydrostatic or pneumatic) results of the" The ITAAC is for a hydrostatic test, therefore it cannot be performed as a pneumatic test.</p> <p>Page D28-4, the top of the page is very confusing, because it lists 2 Attachments.</p> <p>In addition, the Table should not refer to the DCD but to the license.</p>	<p>Not necessary, since the hydrostatic test was performed in accordance with ASME Code Section III.</p> <p>Not necessary, since individuals familiar with this topic would understand the different ASME reports.</p> <p>Not necessary, since individuals familiar with this topic would understand the definition of Class 1, 2, and 3 piping.</p> <p>The staff is unable to endorse this ICN example as written. The pressure testing cannot be performed using pneumatic methods, only as a hydrostatic test.</p> <p>This is editorial and does not affect the staff's ability to endorse NEI 08-01.</p> <p>Staff will add a clarification to RG 1.215.</p>
D-29	<p>On Page D29-1, under "ITAAC Determination Basis": Global comment, you need to be consistent that information to be included should be in { }.</p> <p>On page D29-2, under "ITAAC Determination Basis," 2nd paragraph – Each component listed in Tier 1 Table 2.3.6-1 as ASME Code Section III was fabricated in accordance with the DCD and the ASME BPVC Section III requirements. In addition, does each of these components have a Design Specification which is required by ASME Code Section III? If a Design Specification is required, is this also described in the Design Report referred to in this ITAAC Determination Basis?</p>	<p>This is editorial and does not affect the staff's ability to endorse NEI 08-01.</p> <p>Not necessary, since individuals familiar with this topic would understand the ASME requirements.</p> <p>Not necessary, since</p>

	<p>On page D29-2, under “ITAAC Determination Basis”: What is the purpose of the reconciliation process referred to for piping systems in connection with the ASME Code Section III components contained within each of those piping systems? Are not the components finalized in terms of fabrication before the reconciliation process takes place?</p> <p>On page D29-2, 2nd paragraph: What are the differences between the individual component ASME Section III Code Data Reports and the ASME Section III N-5 Code Data Report(s) ABC which are discussed, related to the fabrication and design of the components, in the ITAAC Determination Basis? Should these differences be called out and explained?</p> <p>On page D29-3rd paragraph: Spell out QA.</p>	<p>individuals familiar with this topic would understand the ASME requirements.</p> <p>Not necessary, since individuals familiar with this topic would understand the ASME requirements.</p> <p>This is editorial and does not affect the staff’s ability to endorse NEI 08-01.</p>
D-30	<p>On page D30-1, ITAAC Determination Basis, specify the article of ASME, if possible.</p> <p>On page D30-2, ITAAC Determination Basis, what elements of the weld did the NDE verify?</p>	<p>Staff will add a clarification to RG 1.215. Citing the specific ASME section is not necessary; however, it could be beneficial, as a reference for the staff, for the ICN to cite the specific ASME Code section.</p> <p>Not necessary, since the ASME Code specifies which types of NDE are needed for pressure boundary welds and what the NDE will detect.</p>
D-31	On page D31-2, ITAAC Determination Basis: Specify the pressure and results of the hydrostatic test, possibly in a table and through the use of a diagram.	Not necessary, since the hydrostatic test was performed in accordance with ASME Code Section III.
D-32	On page D32-2, ITAAC Determination Basis, 2 nd paragraph, 1 st sentence: Add the word “bounding” in the following part “combination of bounding type tests and analyses....”	This is editorial and does not affect the staff’s ability to endorse NEI 08-01.
D-33	<p>On page D33-2, ITAAC Determination Basis, 2nd paragraph, 2nd sentence: Add the words “under conditions” in the following part “the prescribed tests under conditions where the...”</p> <p>Under “ITAAC Determination Basis,” in the 3rd paragraph,</p>	<p>This is editorial and does not affect the staff’s ability to endorse NEI 08-01.</p> <p>Not necessary since the</p>

	<p>specify what types of faults were tested. In the last paragraph, specify/list which “isolation devices prevent credible faults.” In addition, the 1st sentence say “that the most severe credible faults injected...” however, the acceptance criteria says “prevent credible faults” therefore, this implies all faults.</p> <p>The description discusses “isolation barrier devices”, should this be “isolation devices?”</p> <p>On page D33-2 in the first and third paragraphs—The first paragraph refers to isolation barrier components (relay isolation and inductive isolation (transformer coupled)), and the third paragraph refers to fiber optic links. What is the connection between the isolation types referred to in the first and third paragraphs and should not that be indicated here?</p>	<p>ICN discusses the tests being performed per IEEE 384. If the testing of the isolation devices was demonstrated under the most severe credible fault and the isolation devices passed, then this is a bounding scenario and encompasses all credible faults discussed in IEEE 384.</p> <p>This is editorial and does not affect the staff’s ability to endorse NEI 08-01.</p> <p>Not necessary, since the information is contained in the AP1000 DCD and associated technical reports.</p>
D-35	<p>On page D35-1, the Design Commitment discusses lightning protection; however, the ITAAC Determination Basis does not discuss any lightning protection system.</p> <p>On page D35-2, ITAAC Determination Basis: The inspection verifies visual observations of connections of equipment grounding system. Should there not also be a voltage test to verify the voltage for each equipment enclosure, metal structure, metallic tank, ground bus of switchgear assembly, load center, motor control center, and control cabinet being grounded is at ground potential and not above it, similar to the resistance verification?</p> <p>On page D35-2, ITAAC Determination Basis, 2nd paragraph, 2nd sentence: “The equipment grounding system connects to the station grounding grid via XX discreet connection...” The word is misspelled, should be “discrete.”</p>	<p>Not necessary, since the topic is contained in another ITAAC</p> <p>Not necessary, since a voltage check is not needed per RG 1.204 and IEEE standards.</p> <p>The staff is unable to endorse this ICN example as written. The word “discreet” is defined, among other things: “unobtrusive; unnoticeable.” The staff believes that the word should be “discrete,” which means: “constituting a separate entity or individually distinct.”</p>

	Also, put the XX into {XX}.	This is editorial and does not affect the staff's ability to endorse NEI 08-01.
D-39	<p>On page D39-1, ITAAC Determination Basis: The description states that the components exist in the component location, and the table only specifies a building. The locations should be more specific to perform their intended function.</p> <p>For Steam Generator Blowdown and Main Steam Line there are two different monitors in the same building, they cannot be at the same location in that building in order to serve their intended purposes. Even providing an elevation level would be more specific.</p>	<p>Not necessary, since the ICN specifies the methodology used for the inspections and that these inspections "verify that the installed radiation monitors have the appropriate nominal detection range to provide indication of unusual radiological events..."</p> <p>Not necessary, since the ICN specifies the methodology used for the inspections and that these inspections "verify that the installed radiation monitors have the appropriate nominal detection range to provide indication of unusual radiological events...."</p>
D-40	On page D40-1, ITAAC Determination Basis, 2 nd paragraph: Are the controls for Automatic Depressurization System (ADS) Stage 4 Manual Actuation Controls on the Primary Dedicated Safety Panel fixed controls or virtual controls? That should be indicated along with how many or all the controls that can make this actuation.	Not necessary, since the requested information goes beyond the scope of the ITAAC.
D-41	<p>On page D41-2, ITAAC Determination Basis: Specify dc or ac for number of amps.</p> <p>Specify the results in a table.</p>	<p>Not necessary, since the requested information goes beyond the scope of the ITAAC.</p> <p>Not necessary, since the acceptance criteria of the ITAAC does not contain a numerical value; therefore, this information is not needed to verify that the ITAAC has been completed.</p>

D-42	<p>On page D42-1, ITAAC Determination Basis: Change “telephone page” to “telephone/page.”</p> <p>On page D42-1, ITAAC Determination Basis, last sentence: Please add “(Manual zone initiation and Stored (speed dial) zone initiation)” after “two parts.”</p> <p>On page D42-2, Manual zone initiation: What is meant by alarm tone?</p> <p>On page D42-2, Stored (speed dial) zone initiation: Change “Inspection was performed...” to “Inspections were performed...”</p>	<p>This is editorial and does not affect the staff’s ability to endorse NEI 08-01.</p> <p>This is editorial and does not affect the staff’s ability to endorse NEI 08-01.</p> <p>Not necessary, since “alarm tone” is sufficiently clear to demonstrate completion of the ITAAC.</p> <p>This is editorial and does not affect the staff’s ability to endorse NEI 08-01.</p>
D-44	<p>On page D44-2, 2nd paragraph: What parts of QME-1-2007 (Reference 7) are used in connection with this ICN example and qualification of valves for seismic purposes?</p> <p>On page D44-2, ITAAC Determination Basis: Specify the Article of ASME Code.</p> <p>In the 5th paragraph, specify the method used; remove the “i.e.” in the brackets.</p>	<p>Staff will add a clarification to RG 1.215. Citing the specific QME-1-2007 section is not necessary; however it could be beneficial, as a reference for the staff for the ICN to cite the specific QME-1-2007 section.</p> <p>Staff will add a clarification to RG 1.215. Citing the specific ASME section is not necessary; however, it could be beneficial, as a reference for the staff, for the ICN to cite the specific ASME Code section.</p> <p>Not necessary, since “i.e.” specifically indicates that the methods following the “i.e.” were used and these methods encompass the entirety of the ITAAC.</p>
D-45	<p>On page D45-2, ITAAC Determination Basis, in the 4th paragraph, please add a table to specify the</p>	<p>Not necessary, since the attached table contains</p>

	make/model/serial number used for verification.	the Tag Number for each component which demonstrates that the as-built installed components are the same as the seismically qualified components. Therefore, the make, model and serial number are not needed to verify completion of the ITAAC.
D-46	On page D46-2, first paragraph—Is functional capability only to withstand the effects of earthquakes, or also for other design basis events? Crimping of pipe could be caused by other design basis events also. Under “ITAAC Determination Basis,” the 1 st paragraph discusses the “effects of earthquakes.” What about other level C and D events mentioned in Table 3.9-11 of Tier 2 of the AP1000 DCD?	Not necessary, since the design commitment defines the scope of the ITAAC as the SSC being designed to withstand combined normal and seismic design basis loads and the requested information goes beyond this scope.
D-47	<p>On page D47-2, ITAAC Determination Basis, 2nd paragraph: What “design conditions?”</p> <p>For QME-1-2007, specify what article.</p> <p>Explain where the listing of tests was obtained; QME-1-2007 does not discuss all of these tests.</p> <p>What is the connection between these tests and the completion of this ITAAC? Should not that be stated in the ITAAC Determination Basis.</p>	<p>This comment is addressed in the 4th comment below.</p> <p>Staff will add clarification to RG 1.215. Citing the specific QME-1-2007 section is not necessary; however it could be beneficial, as a reference for the staff, for the ICN to cite the specific QME-1-2007 section.</p> <p>Not necessary, since all of the tests are discussed in QME-1-2007.</p> <p>The staff is unable to endorse this ICN example as written. The listing of the tests in the ICN implies that all of the tests were performed on all of the valves; however, this is incorrect. In addition, the description should identify items such as</p>

	<p>On page D47-2, ITAAC Determination Basis, paragraph after bullets: The sentence that states, "Note that no end-loading qualification..." should be revised to state that end-loading valve testing for QME-1-2007 was done per the function of the valve</p> <p>On page D47-2, ITAAC Determination Basis: Where and what is Attachment A.</p>	<p>the functional qualification report and application report required by ASME QME-1-2007 for NRC review. The ICN should indicate whether the specific MOVs were qualified by direct testing, application of a test-based methodology, or extrapolation from other MOV tests.</p> <p>The staff is unable to endorse this ICN example as written. The ICN should indicate whether the specific valves are closed to isolate blowdown flow conditions, or opened to blow down the RCS. If either of these conditions are met, then end-loading valve qualification is required. ASME QME-1-2007 did not anticipate an AP1000 design that opens valves (such as 14-inch ADS squib valves) to blow down the RCS. Valves that operate under blowdown conditions must satisfy end-loading qualification.</p> <p>The staff is unable to endorse this ICN example as written. The last paragraph, refers to Attachment A identifying the Equipment Qualification Document Packages; however, there is no Attachment A in the ICN example. Provide an example of Attachment A.</p>
D-48	Under "ITAAC Determination Basis," 4 th paragraph, specify	Not necessary, since the

	the make, model and serial number in Attachment A.	attached table contains the Tag Number for each component which demonstrates that the as-built installed components are the same as the previously qualified components. Therefore the make, model and serial number are not needed to verify completion of the ITAAC.
D-50	On page D50-2, second full paragraph – The factors that weigh in determining the UA of a heat exchanger should be presented here in appropriate detail with respect to how these factors affect the UA.	Not necessary, since the requested information goes beyond the scope of the ITAAC.
D-52	On page D52-2, first paragraph – Provide some detail regarding what the Integrated System Validation was to accomplish in regard to Human Factors Engineering (HFE) devices and what determined whether it was successfully completed? In the last sentence, it states “provided an appropriate ISV test bed...” What does the term “appropriate” mean? Also, add a reference to the HFE verification and validation implementation plan.	Not necessary, since individuals familiar with this topic would understand that the ISV process and the necessary information is already included in the Validation Plan which the staff has previously approved. Not necessary, since the ICN already references this plan.
D-53	On page D53-2, second paragraph – If the plant control system (PLS) controls this valve, use its system acronym or other descriptor to identify which PLS.	Not necessary, since there is only one plant control system.
D-54	Under “ITAAC Determination Basis,” 1 st paragraph, specify the test load because that must be compared to the acceptance criteria. On page D54-1, ITAAC Determination Basis, 2 nd paragraph – It should be stated what crane is being tested and whether the load testing applies to only the hoist. On page D54-1, ITAAC Determination Basis, 2 nd paragraph – Are both NUREG-0554 Section 8.2 (Reference 4), and ASME NOG-1 (Reference 5) required for this testing? Are both referenced as such in the AP 1000 DCD Tier 1 and 2? Which takes precedence?	Not necessary since the ICN discusses the tested load. Not necessary, since the information in the ICN specifies that the polar crane and main hoist were tested. Not necessary, since the ICN states that both the documents are used and individuals familiar with this topic would understand that these are sufficient methods to

	<p>On page D54-1, ITAAC Determination Basis, 2nd paragraph – Is there any time limit for holding the load? If it is only momentarily, it should be so stated. If it is until load stops any motion, that should be stated.</p>	<p>complete the ITAAC.</p> <p>Not necessary, since the NOG referenced by the ICN discusses how the test was performed.</p>
D-100	<p>Under “ITAAC Determination Basis,” 1. Surface coatings, there is no mention about coatings not transporting.</p> <p>In the 1st sentence, “personnel confirmed that the selected...” The term “personnel” should be replaced with “the licensee” or some other word.</p> <p>2. Component Coatings, 1st paragraph, 1st sentence: specify what components.</p> <p>Also no mention about coatings not transporting.</p> <p>3. Caulking, Tags and Signs, 1st sentence, explain what is meant by “selected material.” The 1st paragraph discusses the tags, signs or caulking and that the selected material being either steel or another material, but the acceptance criteria states that for the tags and signs the material is either steel or another metal.</p>	<p>Not necessary, since as the ICN is written, the density requirement is met and a transport analysis is therefore not required.</p> <p>This is editorial and does not affect the staff’s ability to endorse NEI 08-01.</p> <p>Not necessary, since the ICN describes the category of components to which the protective coating is applied.</p> <p>Not necessary, since as the ICN is written the density requirement is met and a transport analysis is therefore not required.</p> <p>Not necessary, since the concluding sentence in section 3 verifies that the material for the tags and signs is either steel or another metal</p>
D-101	<p>Under “ITAAC Determination Basis,” the 2nd paragraph states “(following concrete placement).” Are there any inspections performed prior to concrete placement?</p> <p>Specify the accuracy of the survey equipment.</p>	<p>Not necessary, since the ICN describes the inspections as being performed “following concrete placement.”</p> <p>Not necessary, since the attached table contains the results which provide an indication of the accuracy of the equipment through the use of significant figures.</p>

	<p>Specify the number of inspection points.</p> <p>On page D101-2, first full paragraph – Should it not be stated here that nuclear island basemat thickness and tolerance will be in accordance with construction drawings for that purpose?</p>	<p>Not necessary, since the ICN describes the methodology used to identify the location and frequency of inspection points to ensure measurements are representative of the entire section being inspected.</p> <p>Not necessary, since the thicknesses and tolerance are specified by the attached ITAAC table.</p>
D-102	<p>On page D102-2, first full paragraph – Please explain why watertight doors are referenced here since there are none for this purpose for the AP1000?</p> <p>Under “ITAAC Determination Basis,” specify and explain what “other provisions” means.</p>	<p>Not necessary, since the ICN could be written for locations which require watertight doors.</p> <p>The staff is unable to endorse this ICN example as written. In order for the staff to find this example acceptable, please replace “other provisions” with “[provide a list of any other provisions used].”</p>
Demo-3	<p>On page Demo 3-1, at the end of the 1st paragraph under the ITAAC Determination Basis, it was requested at a February 16, 2012 public meeting to add the following sentence: “This inspection encompassed all SSCs identified in the Tier 1 design description, including those in tables and figures.”</p>	<p>The staff is unable to endorse this ICN Demo example as written. The staff during a presentation on functional arrangement ITAAC (ADAMS Accession No. ML120440280) provided clarifying language to ensure that this ICN specifically included Tier 1 Design Descriptions, Tier 1 Figures and Tier 1 Tables. This example does not include this language.</p>
E-1	<p>After the last sentence in first paragraph, add the following depending on which is correct. [With this letter, {Licensee} has provided the entire set of notifications for ITAAC that will</p>	<p>Staff will add a clarification to RG 1.215.</p>

	not be completed 225-days prior to initial fuel load. OR {Licensee} will at a later date provide additional notifications for ITAAC that will not be completed 225-days prior to initial fuel load.]	
E-2	<p>Subject Line – Add "(ITAAC identifier should exactly match the ITAAC number in the COL)" which is from the Appendix D-1 template.</p> <p>Design Commitment and Acceptance Criteria are missing a period after the word source.</p>	<p>This would be a helpful clarification, but does not affect the staff's ability to endorse NEI 08-01.</p> <p>This is editorial and does not affect the staff's ability to endorse NEI 08-01.</p>
App H	On page H-3, 4th entry in the table at the top of the page, change "56" to "5.6"	This is editorial and does not affect the staff's ability to endorse NEI 08-01.
	10 CFR 52.103 Scheduled Fuel Load Notification content: The initial notification should include the anticipated date (270 days in the future) of initial loading of fuel. The updates required by 10 CFR 52.103 should include updates to the anticipated date and the reason for any change, if applicable. In determining the anticipated date, the licensee should use NRC guidance on timeframes for completion of its review and the making of the 10 CFR 52.103(g) finding.	Staff will add a clarification to RG 1.215.
Global	<p>Under "Finding Review," why is the language different in various examples notifications, make all of the language the same, such as Finding or Findings.</p> <p>Under "Finding Review," the first sentence starts with the fact that the review was done in accordance with plant procedures for ITAAC completion. Is there only one procedure used for all of the ITAAC Finding Reviews? Is the procedure referenced anywhere?</p> <p>Under "ITAAC Completion Statement," the 2nd paragraph says that the ITAAC are maintained using approved plant programs and procedures. Are these always the same? Are they referenced anywhere?</p>	<p>This is editorial and does not affect the staff's ability to endorse NEI 08-01.</p> <p>Not necessary, since the requested information is contained elsewhere in NEI 08-01 and does not need to be included in the ICN.</p> <p>Not necessary, since the requested information is contained elsewhere in NEI 08-01 and does not need to be included in the ICN.</p>