

April 14, 2016

MEMORANDUM TO: Michael Junge, Chief  
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and ITAAC Branch  
Division of Construction Inspection  
and Operational Programs  
Office of New Reactors

FROM: James Gaslevic, Reactor Operations Engineer */RA/*  
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Division of Construction Inspection  
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Office of New Reactors

SUBJECT: SUMMARY OF MARCH 16, 2016, CATEGORY 3 PUBLIC  
TELECONFERENCE TO DISCUSS THE U.S. NUCLEAR  
REGULATORY COMMISSION'S PILOT PROJECT AND INDUSTRY  
INPUT ON UNCOMPLETED INSPECTIONS, TESTS, ANALYSES, AND  
ACCEPTANCE CRITERIA NOTIFICATIONS

The U.S. Nuclear Regulatory Commission (NRC) held a Category 3 public teleconference on March 16, 2016, to discuss the staff's comments on the Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Notifications (UINs) submitted by industry as part of the UIN pilot project. Participants included personnel from Southern Nuclear Operating Company (SNC), Westinghouse Electric Company (WEC), South Carolina Electric & Gas (SCE&G), Duke Energy, interested nuclear industry representatives, and members of the public.

The public meeting notice can be found in the Agencywide Documents Access and Management Systems (ADAMS) under Accession Number ML16063A138. This meeting notice is also posted on the NRC public website.

The meeting agenda and list of participants are attached as Enclosures 1 and 2. The UINs discussed can be found in ADAMS under Accession Numbers ML15324A368 and ML16055A416.

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**Background:**

On September 30, 2015, the NRC held an introductory Category 3 public meeting on the pilot project. The pilot project exercises the NRC staff's review of UINs that would be submitted earlier than the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) 52.99(c)(3). Potential benefits are a reduction to NRC staff's review time during the expected surge of ITAAC Closure Notifications (ICNs) late in construction and earlier availability of public information on licensee ITAAC closure plans, which in turn could allow the NRC to identify potential ITAAC closure issues earlier in the construction process. A public meeting teleconference was held on February 11, 2016 to discuss the first set of UINs.

**Overview:**

The purpose of this second teleconference was to provide feedback on the second set of UINs, as well as continue discussions on an open issue from the last teleconference.

UIN for ITAAC #28: The staff identified that code references in the UIN's completion description requires edition and addenda information consistent with the examples of NEI 08-01.

UIN for ITAAC #29: The staff identified that the UIN's completion description should add that the testing and analysis was done "in accordance with" the referenced code to align with the inspection, test, and analysis.

UIN for ITAAC #513: The staff identified that the UIN's completion description should specify the software diversity section of the referenced NUREG/CR 6303 so that the reader understands which portion of the NUREG to use.

UIN for ITAAC #553: Continuing the discussion from the last teleconference, the staff reiterated its position that the UIN's ITAAC Completion Description should discuss the expected outputs from each of the lifecycle stages and how the outputs will be determined to be acceptable. The staff also discussed that this ITAAC includes the implementation and testing of the as-built CIM in accordance with its design process. The licensees' position remains that the ITAAC only requires verification that a process is in-place.

Staff also requested that this UIN pilot project be extended to include at least 30 examples of UINs. Although this extends the completion schedule into later this year, staff believes that exercising a larger population of complex and moderately-complex ITAAC is needed to achieve more accurate results.

**Public Participation:**

At various times during the teleconference, NRC staff solicited the public for input. One member of the public requested that participants in this pilot project should acknowledge that

decisions and positions made on the pilot-specific UINs should not be taken as a guarantee that notifications on ITAAC submitted to the NRC as part of regulatory requirements will automatically be accepted in the future.

Docket Nos.: 52-025  
52-026  
52-027  
52-028

Enclosures:  
As stated

cc w/encls (1 and 2): See next page

decisions and positions made on the pilot-specific UINs should not be taken as a guarantee that notifications on ITAAC submitted to the NRC as part of regulatory requirements will automatically be accepted in the future.

Docket Nos.: 52-025  
52-026  
52-027  
52-028

Enclosures:  
As stated

cc w/encls (1 and 2): See next page

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## Meeting Agenda

### **SUMMARY OF MARCH 16, 2016, CATEGORY 3 PUBLIC TELECONFERENCE TO DISCUSS THE NRC PILOT PROJECT AND INDUSTRY INPUT ON UNCOMPLETED INSPECTIONS, TESTS, ANALYSES, AND ACCEPTANCE CRITERIA (ITAAC) NOTIFICATIONS**

Purpose: To discuss the staff's comments on the Uncompleted ITAAC Notifications (UINs) submitted by industry as part of the UIN pilot project – including NRC's position regarding UIN #553 submitted by Southern Nuclear Company and SCANA

| <b>Public Meeting</b> |   |
|-----------------------|---|
| 9:00 a.m.             | Welcome and Introductions   |
| 9:10-9:55 a.m.        | NRC / Industry / Public - to Discuss and Provide Input on UINs Provided For Pilot Project |
| 9:55 a.m.             | Action Items / Feedback   |
| 10:00 a.m.            | Adjourn Meeting   |

## **List of Attendees**

**March 16, 2016**

| Name              | Work Location/Organization            |
|-------------------|---------------------------------------|
| James Gaslevic    | Nuclear Regulatory Commission (NRC)   |
| Bruce Bovol       | NRC                                   |
| Ken Mott          | NRC                                   |
| Surinder Arora    | NRC                                   |
| Michael Junge     | NRC                                   |
| Edmund Kleeh      | NRC                                   |
| Dinesh Taneja     | NRC                                   |
| Nick Kellenberger | South Carolina Electric & Gas (SCE&G) |
| Jerry Money       | SCANA                                 |
| Brian Bedford     | Westinghouse Electric Company (WEC)   |
| Sarah DiTommaso   | WEC                                   |
| Robert Lane       | WEC                                   |
| Bob Hirmanpour    | Southern Nuclear Company (SNC)        |
| Calvin Morrow     | SNC                                   |
| Maggie Koyo       | SNC                                   |
| Kara Stacy        | SNC                                   |
| David Logue       | SNC                                   |
| Bob Sutter        | SNC                                   |
| Maria Jaworsky    | Duke Energy                           |
| Katherine Leigey  | Georgia Public Service Commission     |
| Russ Bell         | Nuclear Energy Institute              |
| Ravi Joshi        | Public                                |

Enclosure 2

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(Revised 03/10/2016)

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(Revised 03/10/2016)

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