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United States Nuclear Regulatory Commission

Protecting People and the Environment

Inspections, Tests, Analyses and Acceptance Criteria Demonstration Project

April 24, 2017
Rockville, MD

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Public Meeting Overview

Purpose

- To evaluate the NRC's processes and provide recommendations to maximize its effectiveness and efficiency in meeting the ITAAC closure demands expected during the ITAAC surge

Agenda

- Introduction
- ITAAC Closure Notification Process
- ITAAC Inspection Process
- ITAAC Surge Inspection Demonstration
- ITAAC Closure Notification Surge Demonstration
- Preliminary Recommendations and Next Steps

- Open discussion with licensees after each topic

Abbreviations

- ITAAC — Inspections, Tests, Analyses, and Acceptance Criteria
- ICN — ITAAC Closure Notification
- UIN — Uncompleted ITAAC Notification
- IPCN — ITAAC Post-Closure Notification
- VEF — Verification Evaluation Form
- DAC — Design Acceptance Criteria-ITAAC in the design certification
- ACT — The Atomic Energy Act of 1954, as amended
- COL — Combined License
- IIL — Insufficient Information Letter
- PPL — Potential Problem Letter
- VOICES — Verification of ITAAC Closure, Evaluation, and Status
- CIPIMS — Construction Inspection Program Information Management System
- 52.103(g) — The NRC finding made at the end of construction by the NRC once all ITAAC are completed and all acceptance criteria are met

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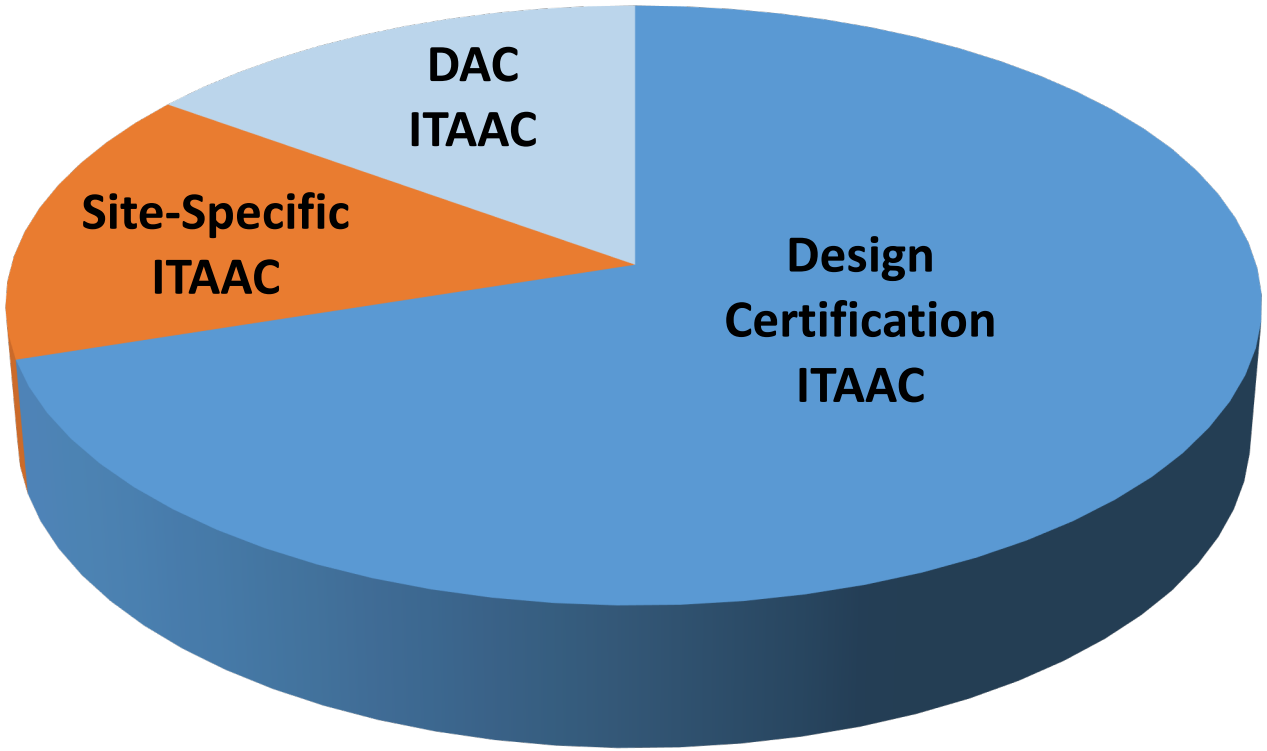
ITAAC Introduction and Closure Notification Process

ITAAC are required by 10 CFR Part 52



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Appendix C of Each COL

(~ 874 ITAAC)

ITAAC provide reasonable assurance the facility has been constructed and will be operated in conformity with the license, provisions of the ACT, and the Commission's rules and regulations

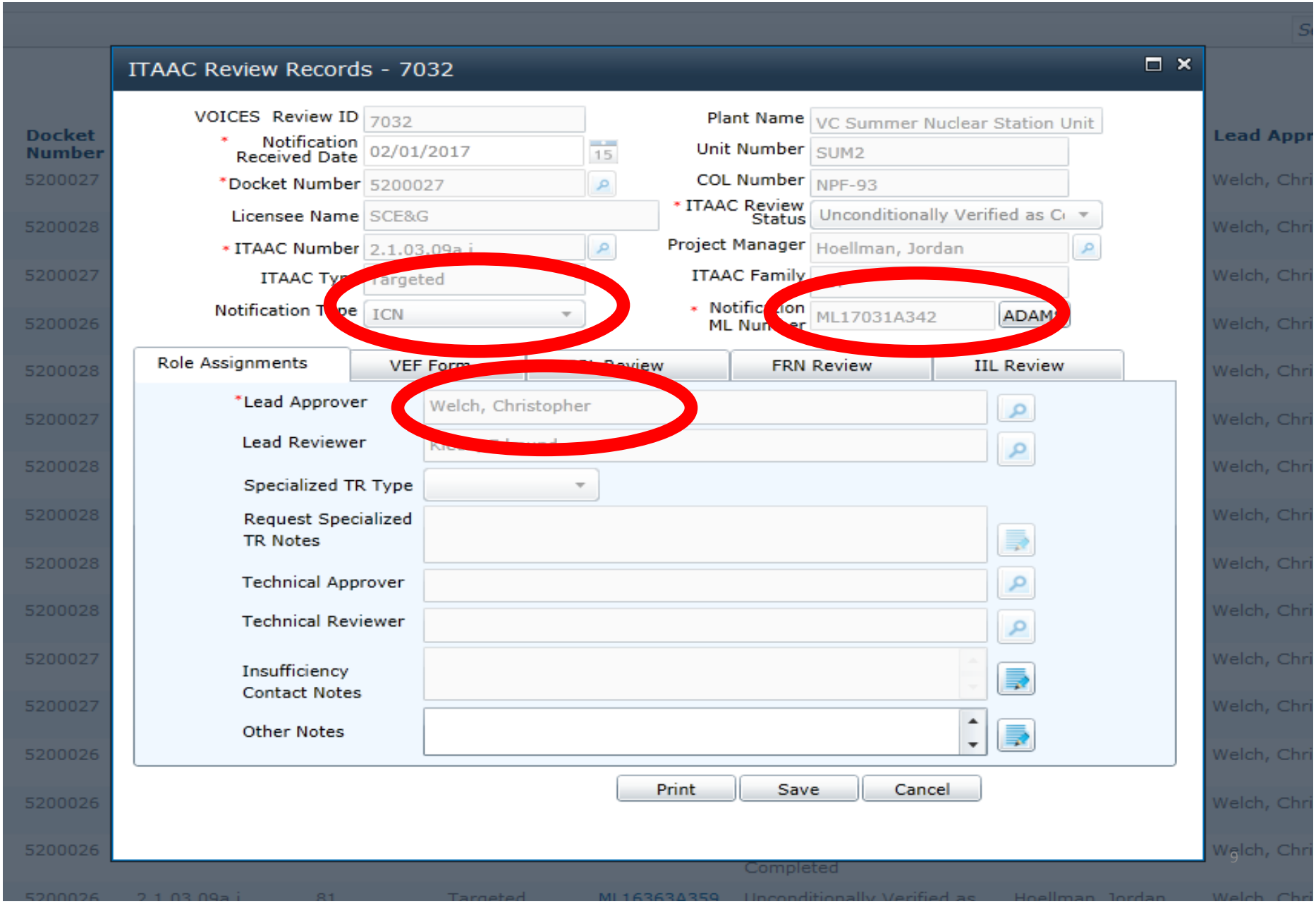
ITAAC Closure Process Infrastructure

- **Procedures**:
  - Regulatory Guide 1.215 “Guidance for ITAAC Closure Under 10 CFR Part 52
  - NEI 08-01 “Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52”
  - NRO-REG-103 Inspections, Tests, Analyses and Acceptance Criteria Closure Verification Process
- **IT infrastructure:**
  - VOICES and CIPIMS

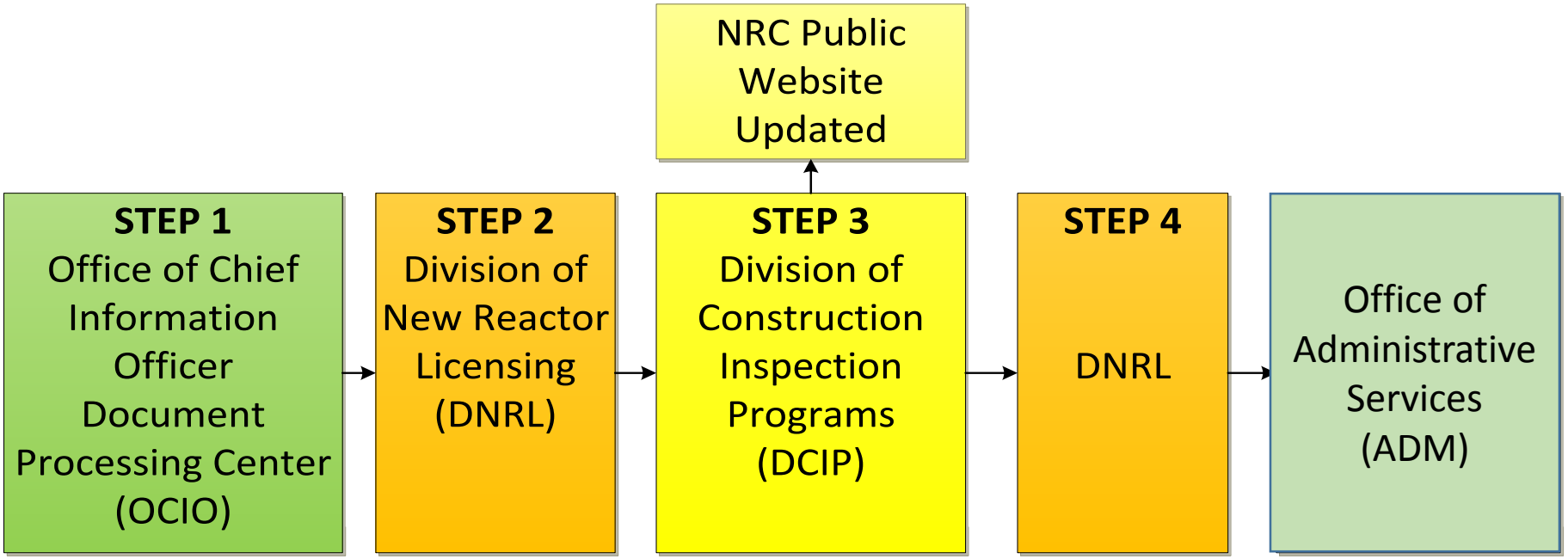
    Both IT systems are fully functional via remote access in the event of a Major Event (e.g., pandemic).

    Roles within VOICES can be filled by numerous individuals simultaneously.

VOICES ITAAC Review Record



ITAAC Closure Process Steps



300/day

- Processes Document Submittals
- ADAMS
- E-RIDS

100/day

- Checks for Open Licensing Actions
- Creates VOICES Record

200 - 440/month

- Reviews ICN/UIN Completes VEF & ADAMS Entry
- Obtains Tech Staff Assistance as Required
- Updates Public Website

1 FRN/week/unit

- Federal Register Notice
- Insufficient Information Letter
- Potential Problem Letter
- Processes the Federal Register Notice

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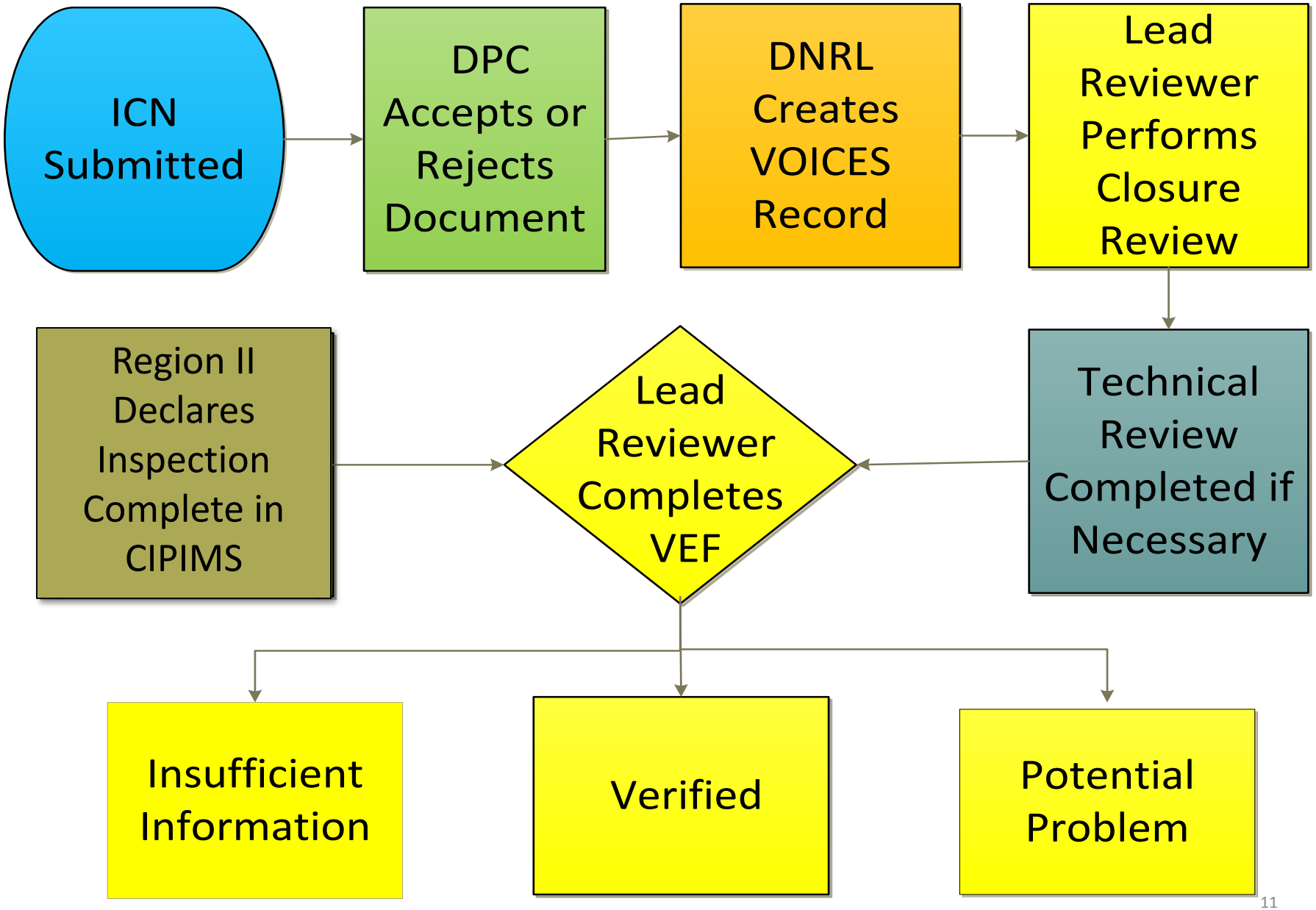
Process Overview

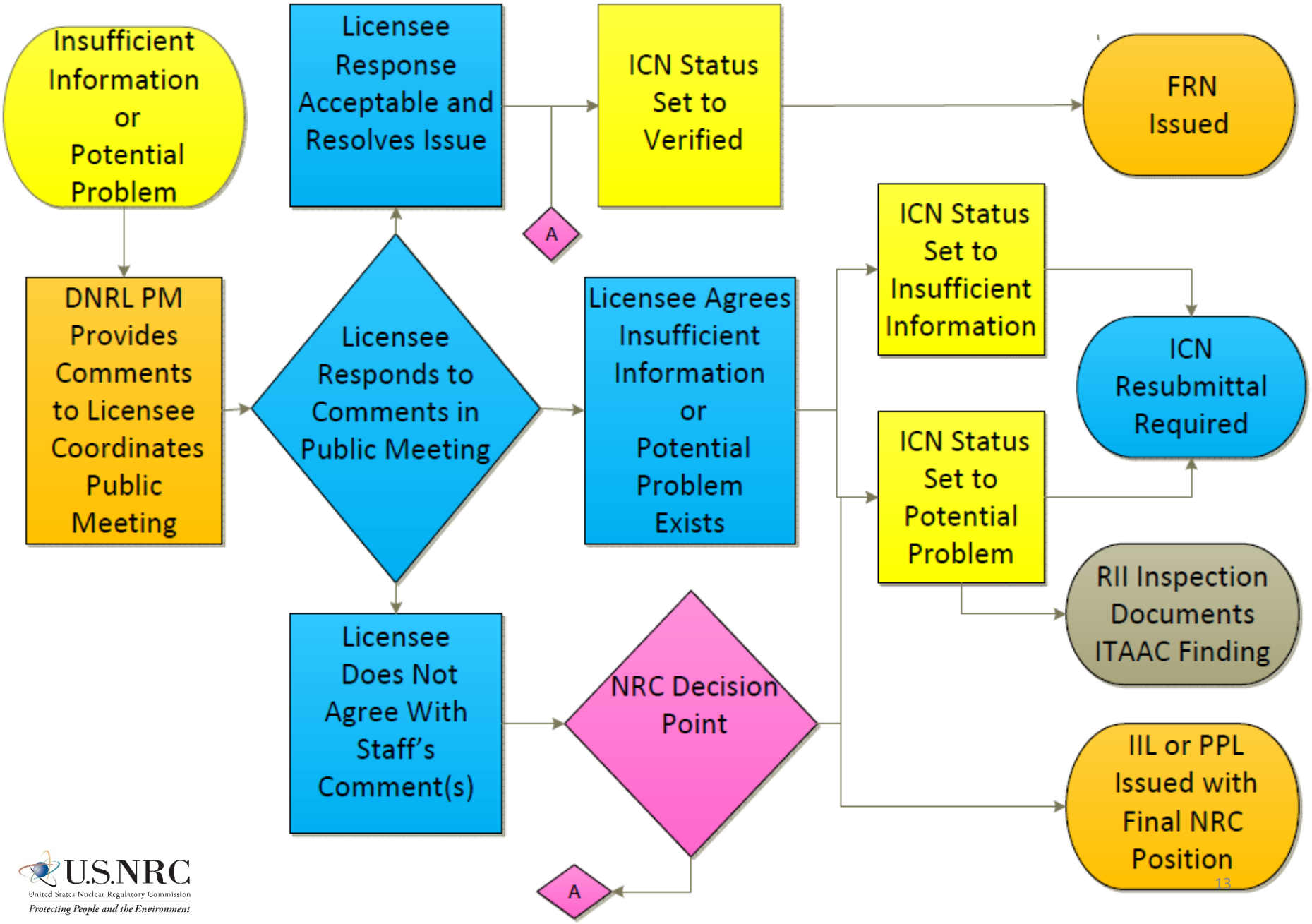


Technical Staff Reviews

Tech Staff ICN reviews are focused on the acceptability of the information provided in the notification.

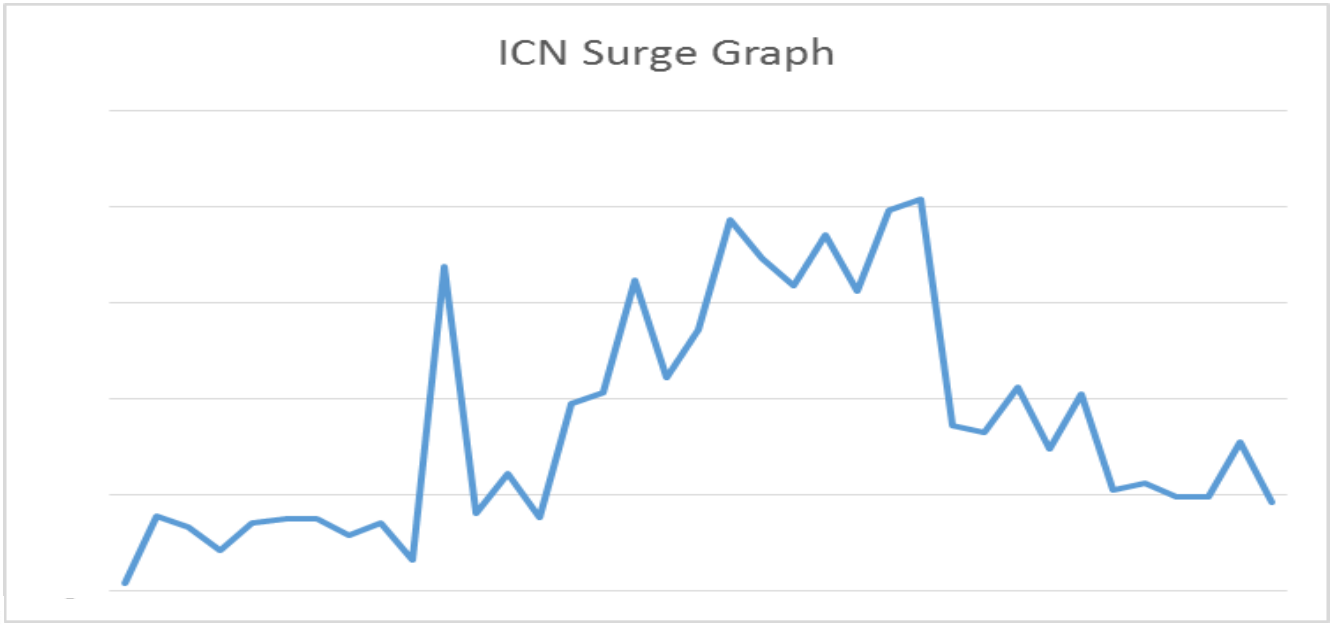
1. Emergency Planning
2. Security
3. Design Acceptance Criteria
4. Digital Instrumentation and Controls
5. Human Factors Engineering
6. Complex ITAAC
7. Lead Reviewer identifies significant issue(s)

ICNs With Challenges

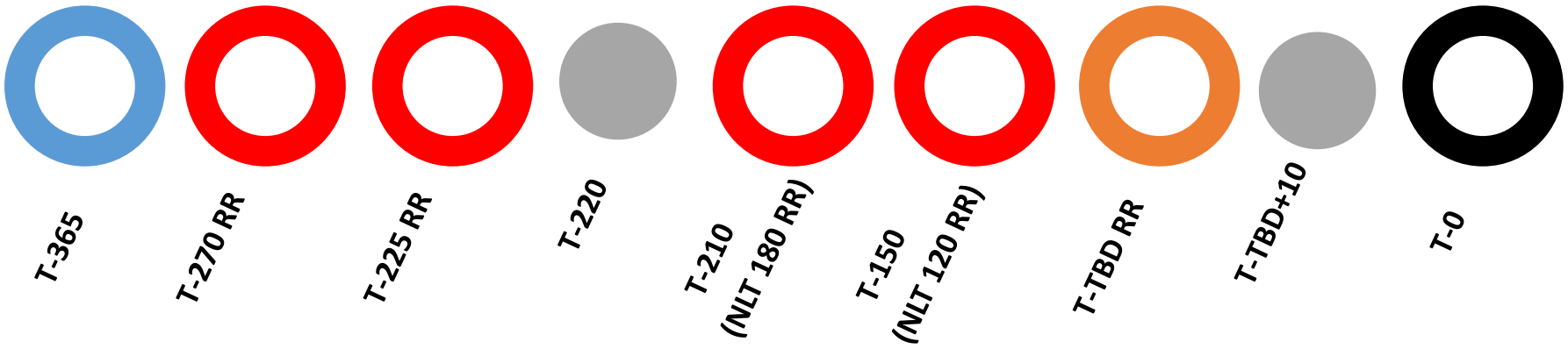


What is the ITAAC Surge

- There are 2 parts to the ITAAC surge – construction inspection and closure
- There will be a peak in construction inspection activities one to two years before the end of the construction of each unit, which will cause a surge in ITAAC inspections
- In addition to the Unit specific surge, overlapping construction schedules for all four Units may amplify the ITAAC surge



Key Milestones



T-365: Projected Start of the ICN Surge*
*All four units, peak is at T-180 of the first unit

T-270 RR: Notice of Fuel load Date NLT 270 Days Prior
T-225 RR: All UINs submitted NLT 225 days Prior to Fuel Load
T-220: VOICES audit of UINs & ICNs complete. For each ITAAC an ICN or UIN must exist on the public website.
T-210: Notice of Intended Operations FRN Published
[Regulatory Requirement is NLT 180]

T-150: Deadline to request ITAAC Hearing
[Regulatory Requirement is 60 days after issuance of Intended Operations FRN]

T-TBD RR: **"All ITAAC Complete Notification"**

T-TBD + 10: NRC Issues SECY plus Basis Document to the Commission
{RII inspections and 52.103(g) basis document input completed. NRO ICN reviews and inputs for 52.103(g) basis document complete.}

T-0: Issue 52.103(g) Finding

Legend

○ **RR** – Regulatory Requirement
• Other milestone
NLT – No Later Than

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Focus Areas and Preliminary Recommendations

1. Continue to enhance and adapt ICN review workflows for timely ICN reviews.
   - Continue to utilize weekly public meeting for early resolution of ICN issues
   - Enhance NRC's guidance to provide more clarity and consistency for processing ITAAC closure notification issues
2. Provide tools to inform the status of ITAAC closure notifications to support timely ICN reviews.
   - Develop performance dashboard for early identification and resolution of ITAAC closure related issues

Performance Dashboard:

For concept only, this is a potential dashboard.

NRC Processes Associated With ITAAC Completion			
ITAAC CLOSURE PROCESS	**STATUS**	**ITAAC INSPECTION ACTIVITIES**	**STATUS**
(A.1) Process Document Submittals		**(B.1)** Perform Inspection Activity (Includes Prep/Doc)	
(A.2) Creating ICN Records in VOICES		**(B.2)** Technical Assistance Requests (TARs)	
(A.3) ICN/UIN Reviews		**(B.3)** Unresolved Items (URIs)	
(A.4) Generates FRN and Insufficient Info/Potential Problem Letters		**(B.4)** ITAAC Finding Affects AC	
(A.5) Processes FRN		**(B.5)** Late Filed Allegations/Petitions	
(A.6) Insufficient Info/Potential Problem Letters		**(B.6)** ITAAC Post-Closure Notifications (IPCN)	

For example:

Dashboard Bases Document	**METRIC COLOR EQUIVALENTS**		
	GREEN	**YELLOW**	**RED**
(A.3) Metric for ICN/UIN Reviews	ICN/UIN review open X weeks	ICN/UIN review open for Y weeks	ICN/UIN review open for Z weeks
(A.3) ADDITIONAL ACTION REQUIRED:	None	Notify Division Director and do ….	Notify office director and do….

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ITAAC Closure Notification Process – Questions/Open Discussion with the Licensees

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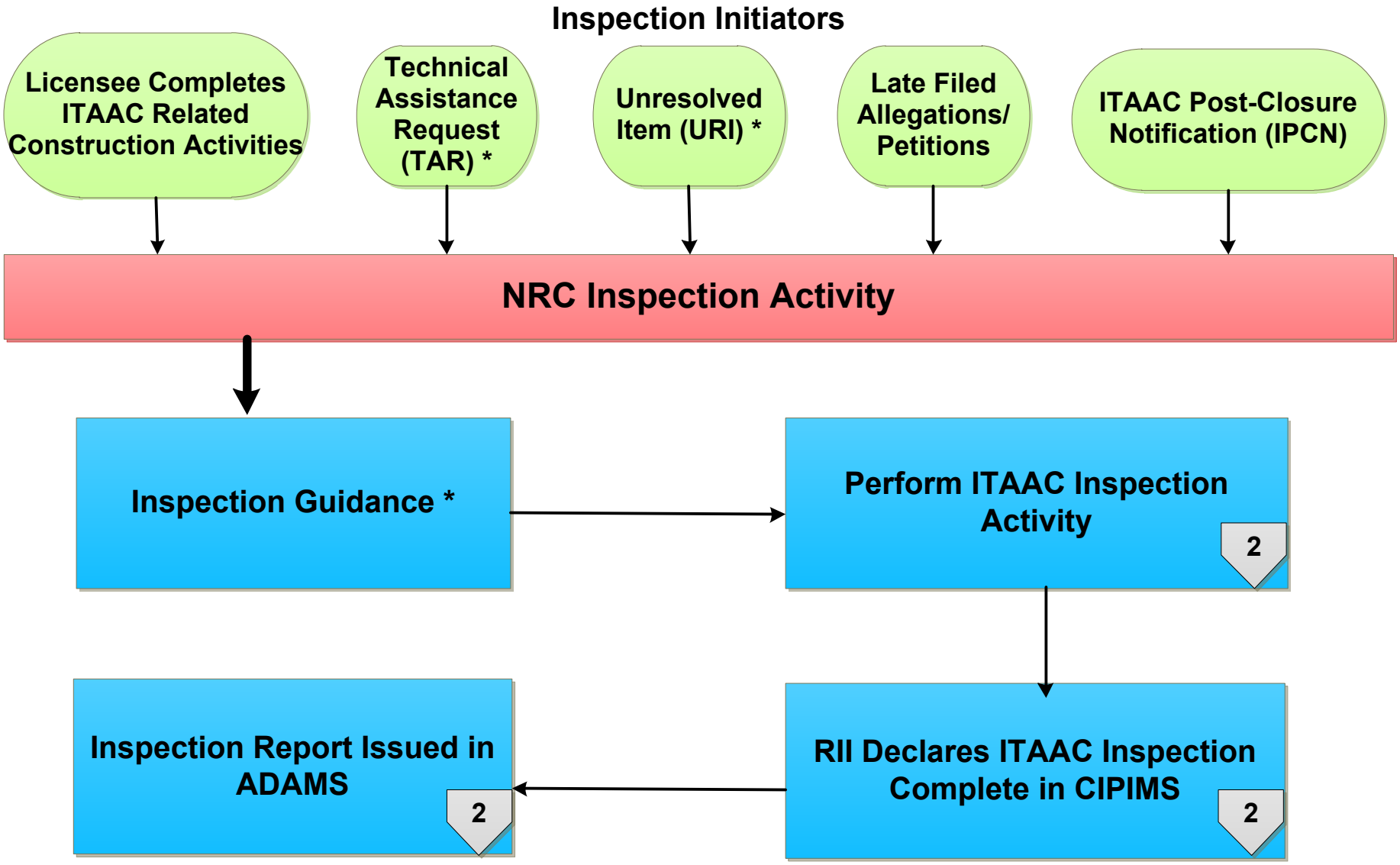
ITAAC Inspection Process

1

ITAAC Inspection Process



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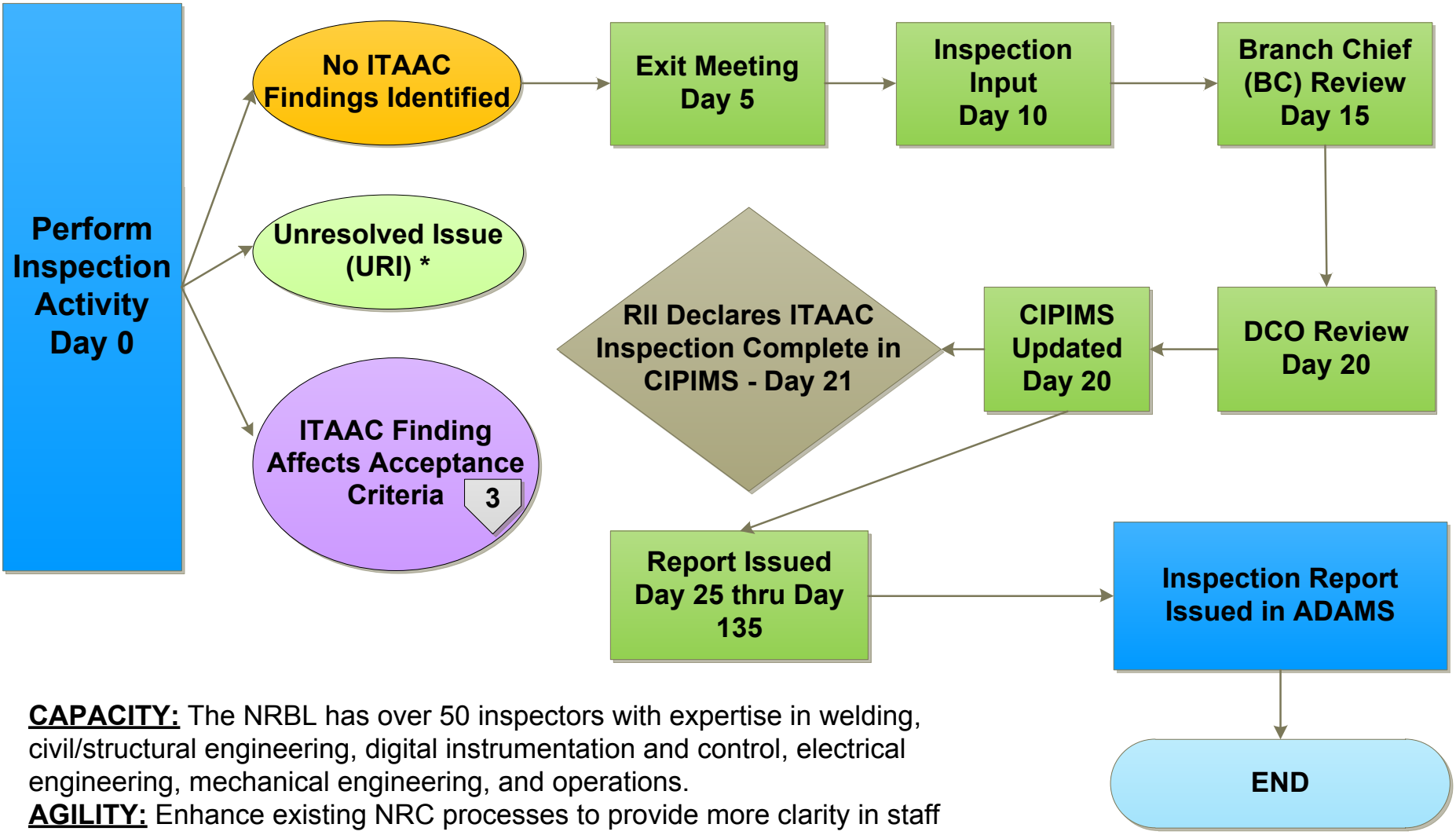
* Additional Information in Background Handouts

Perform ITAAC Inspection Activity



CAPACITY: The NRBL has over 50 inspectors with expertise in welding, civil/structural engineering, digital instrumentation and control, electrical engineering, mechanical engineering, and operations.

AGILITY: Enhance existing NRC processes to provide more clarity in staff level guidance for the timely processing of potential ITAAC technical issues that may occur during the ITAAC Surge and the 103(g) finding timeframe.

DECISION-MAKING: ITAAC Inspection completion and results determine when ITAAC can be closed in CIPIMS

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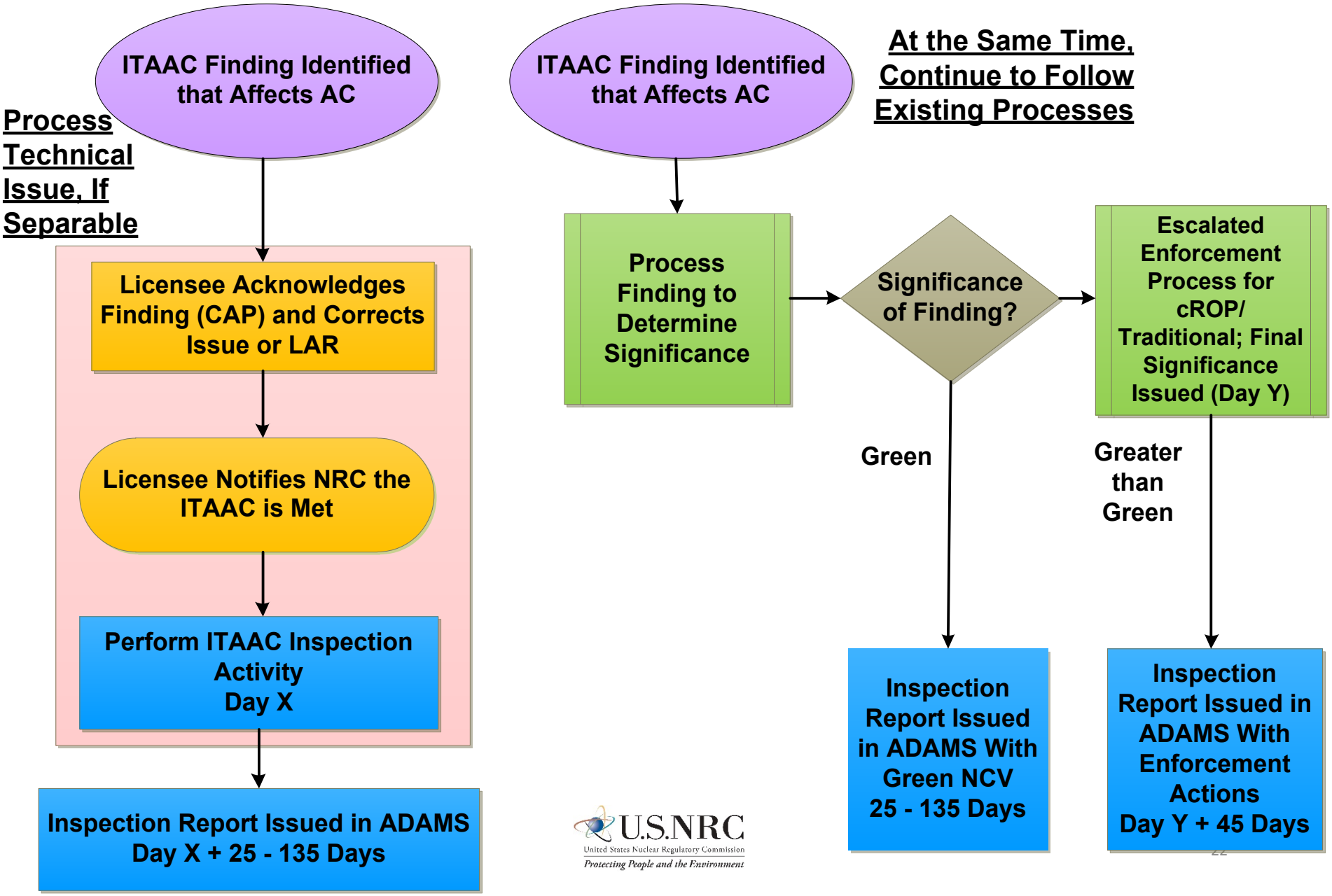
*** Additional Information in Background Handouts**

ITAAC Finding that Affects Acceptance Criteria



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Focus Areas and Preliminary Recommendations

1. Continue to focus on safety mission work while considering enhancements to existing processes that would result in more timely ITAAC inspection results
   - Enhance NRC's guidance to provide more clarity and consistency for inspecting and processing potential ITAAC technical issues that may occur around the 103(g) finding timeframe
   - Develop performance dashboard for early identification and resolution of ITAAC closure related issues

Performance Dashboard:

For concept only, this is a potential dashboard.

NRC Processes Associated With ITAAC Completion			
ITAAC CLOSURE PROCESS	**STATUS**	**ITAAC INSPECTION ACTIVITIES**	**STATUS**
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For example:

Dashboard Bases Document	**METRIC COLOR EQUIVALENTS**		
	GREEN	**YELLOW**	**RED**
(B.3) Metric Processing and resolving URIs six months from 103g	URI open X weeks	URI open for Y weeks	URI open for Z weeks
(B.3) ADDITIONAL ACTION REQUIRED:	None	Notify Division Director and do ….	Notify ORA and do….

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ITAAC Inspection Process– Questions/Open Discussion with the Licensees

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ITAAC Surge Inspection Demonstration

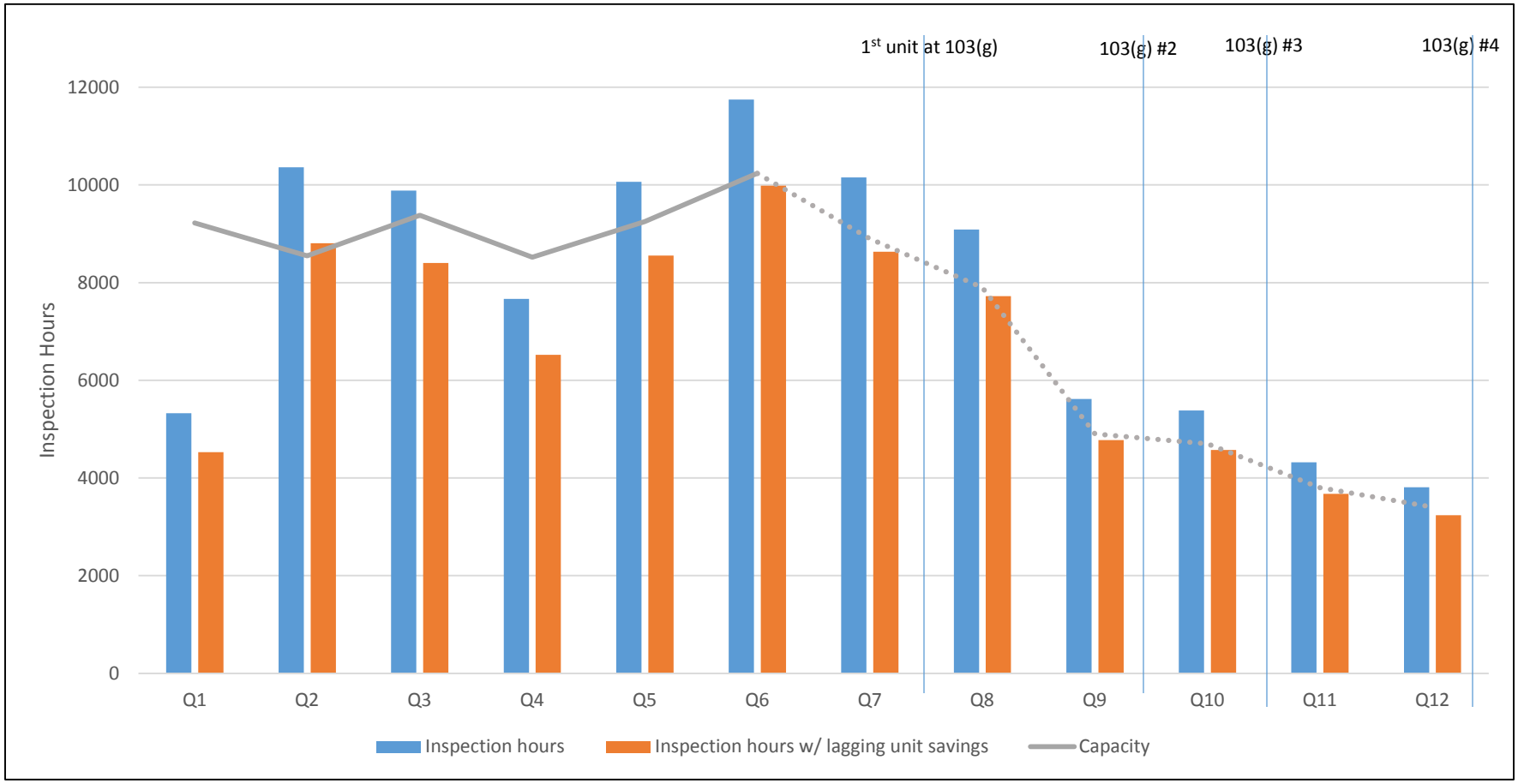
ITAAC Surge Scenarios

- Three scenarios were used to test inspection capacity
- Time is delineated by quarters with the end of Q12 as the final 103(g) date
- Scenario 1 – All 4 units with different 103(g) dates
- Scenario 2 – All 4 units with same 103(g) date
- Scenario 3 – Lead units complete together, lag units with 6 month delay
- Scenarios include all inspections, projected allegation work, projected enforcement, and project management for Vogtle and Summer

ITAAC Inspection Assumptions

- Inspection hour estimates are based on separate programmatic inspections for each unit
- Initial conservative estimate of resources – Inspection planning estimates compared to actuals are higher. There is an inspection savings of about 30% on the second unit for the site (Summer 3, Vogtle 4)
- Capacity is based on current resources allocated to construction inspection. Capacity past Q6 is projected (dashed line)
- Additional inspectors are available for support during the surge, if needed

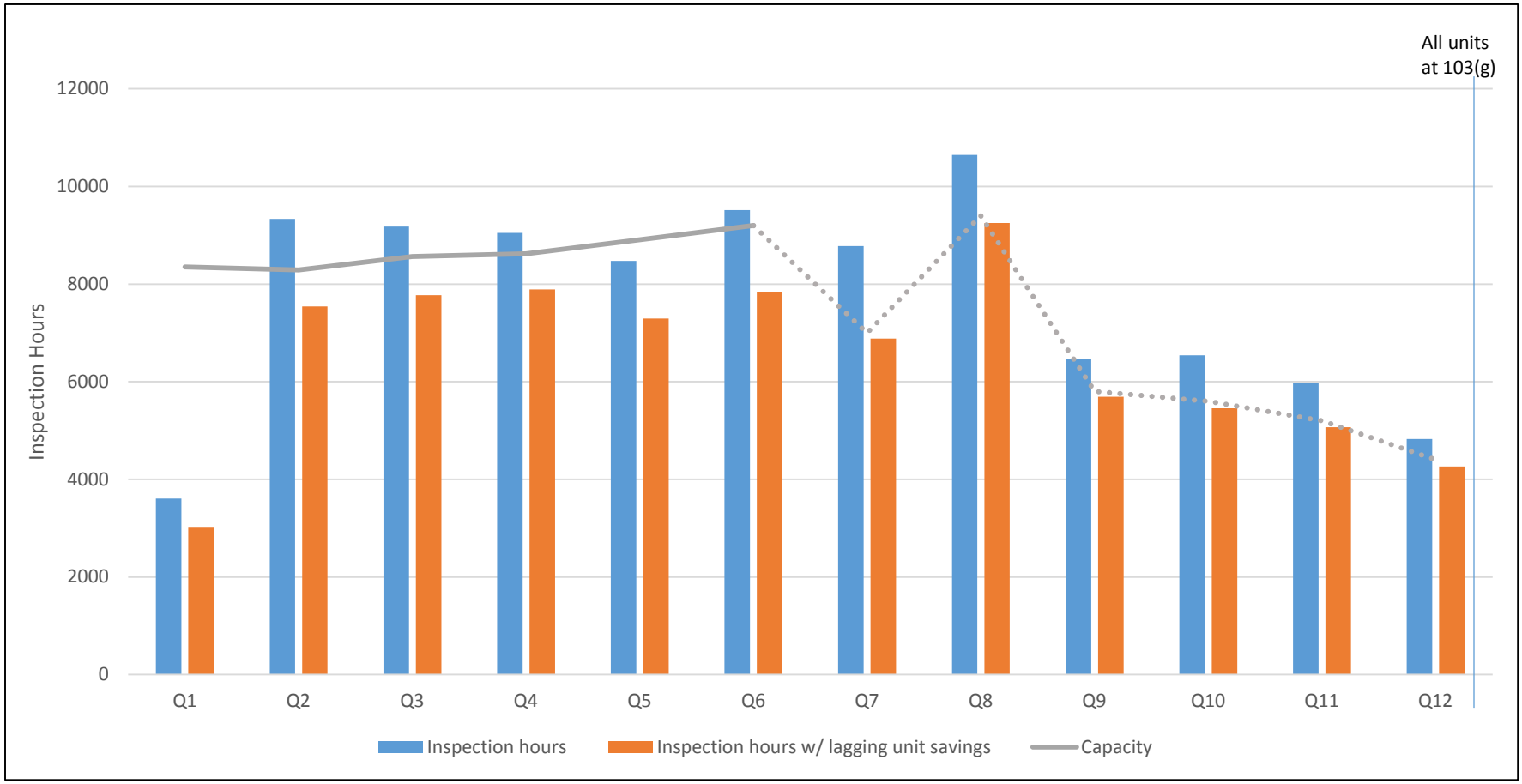
Scenario # 1 – Different 103(g) Dates



Mitigating strategies:

- Additional inspection support, if needed
- Historical 30% savings on lagging unit
- Adjust inspection schedules for non time-sensitive inspections

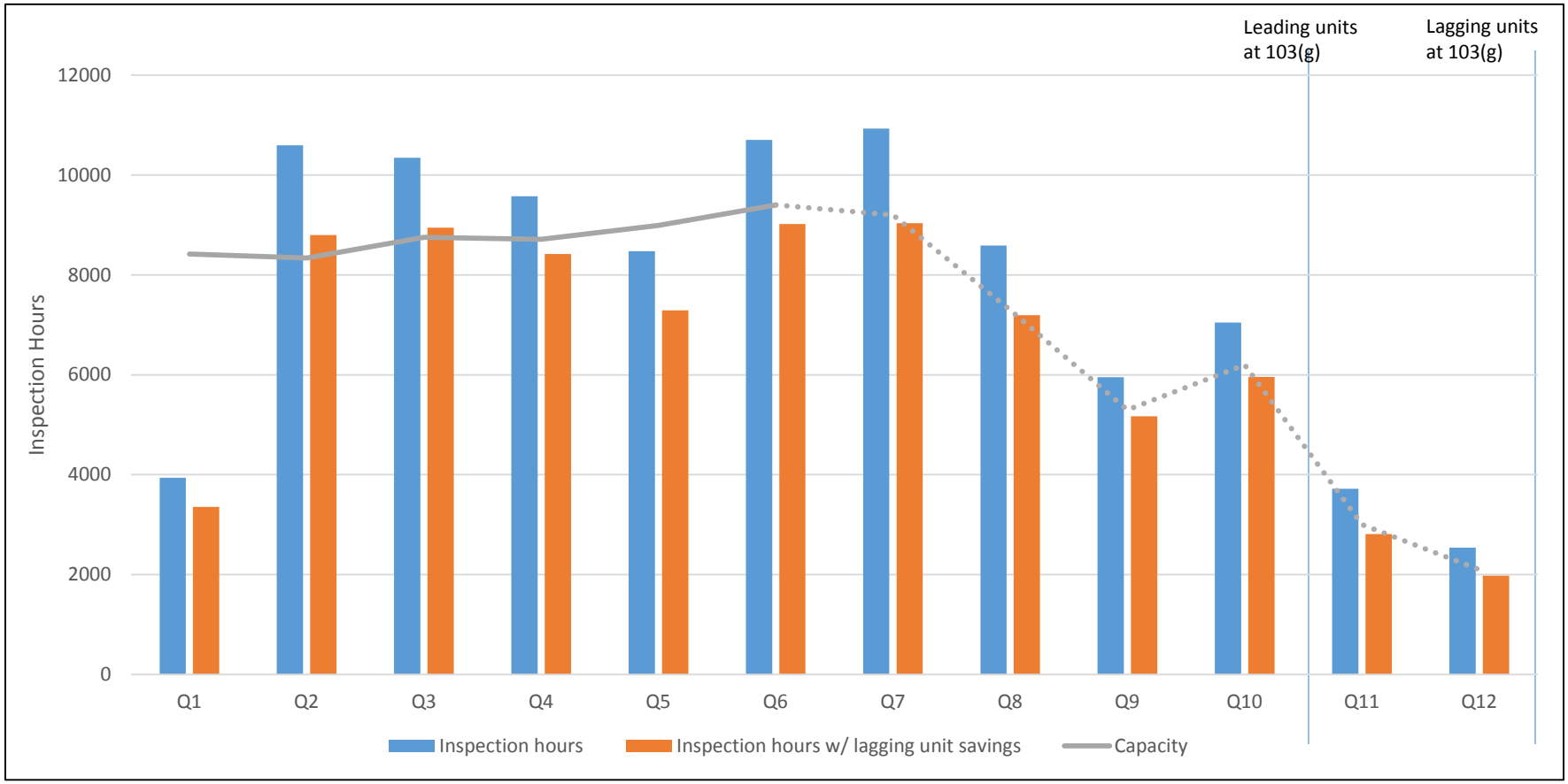
Scenario # 2 – All units with same 103(g)



Mitigating strategies:

- Additional inspection support, if needed
- Historical 30% savings on lagging unit
- Adjust inspection schedules for non time-sensitive inspections

Scenario # 3 – Two groups of 103(g) dates



Mitigating strategies:

- Additional inspection support, if needed
- Historical 30% savings on lagging unit
- Adjust inspection schedules for non time-sensitive inspections

NRC Inspection Agility

- Construction project managers will coordinate with licensees to inspect the short term activities (placing reactor vessel) as they occur. The long-term activities (paperwork review) will be moved as resources are available
- NRC maintains oversight of inspection progress through Primavera and CIPIMS

Focus Areas and Preliminary Recommendations

1. Maintain inspection scheduling flexibility
   - Continue to interact with licensee on construction schedules
   - Develop performance dashboard for early identification and resolution of ITAAC closure related issues
2. Maintain qualified inspection staff
   - Continue to cross train additional staff to maintain workflow capacities for inspection activities during surge

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ITAAC Surge Inspection Demonstration – Questions/Open Discussion with the Licensees

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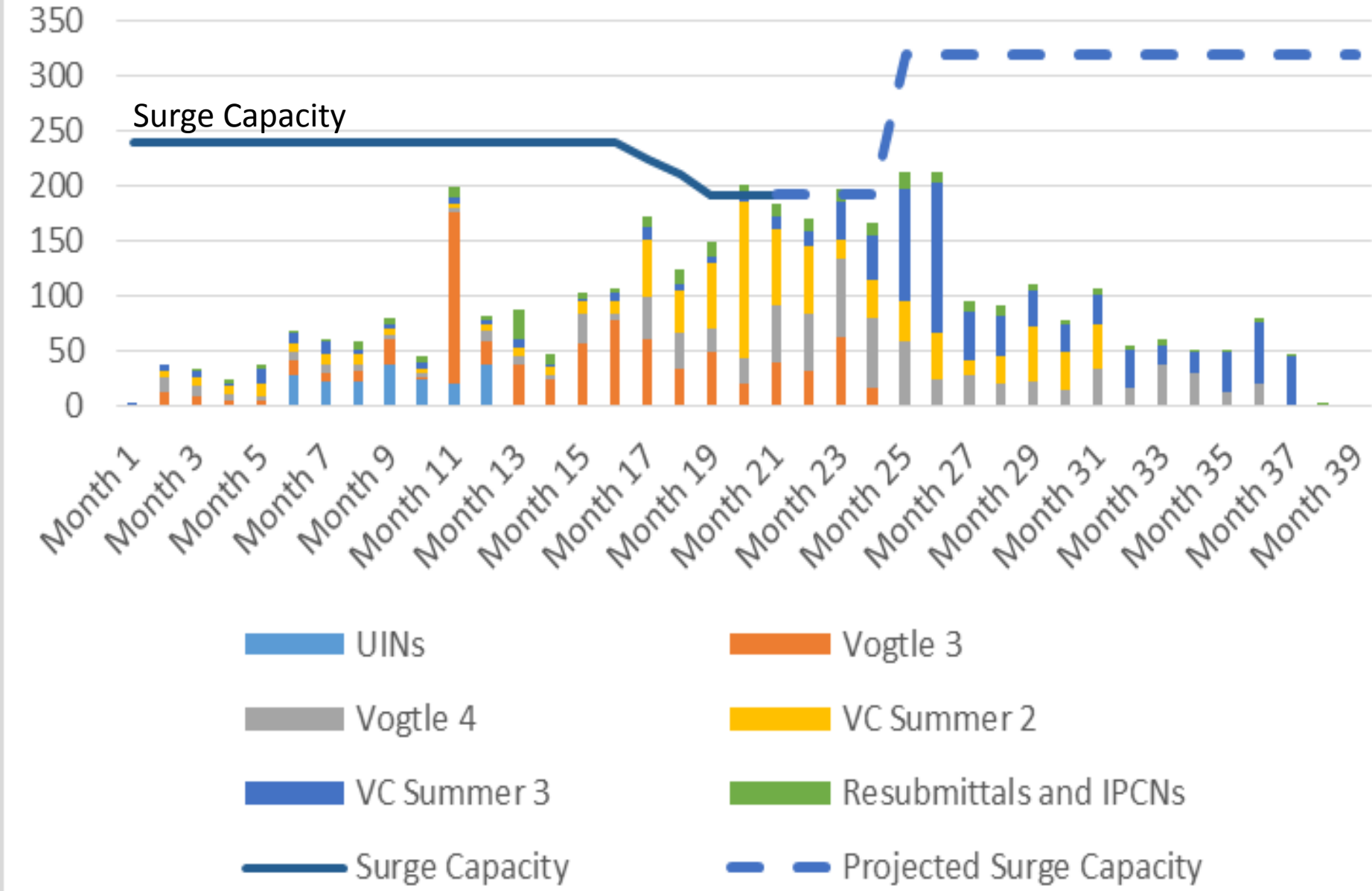
ITAAC Closure Notification Surge Demonstration

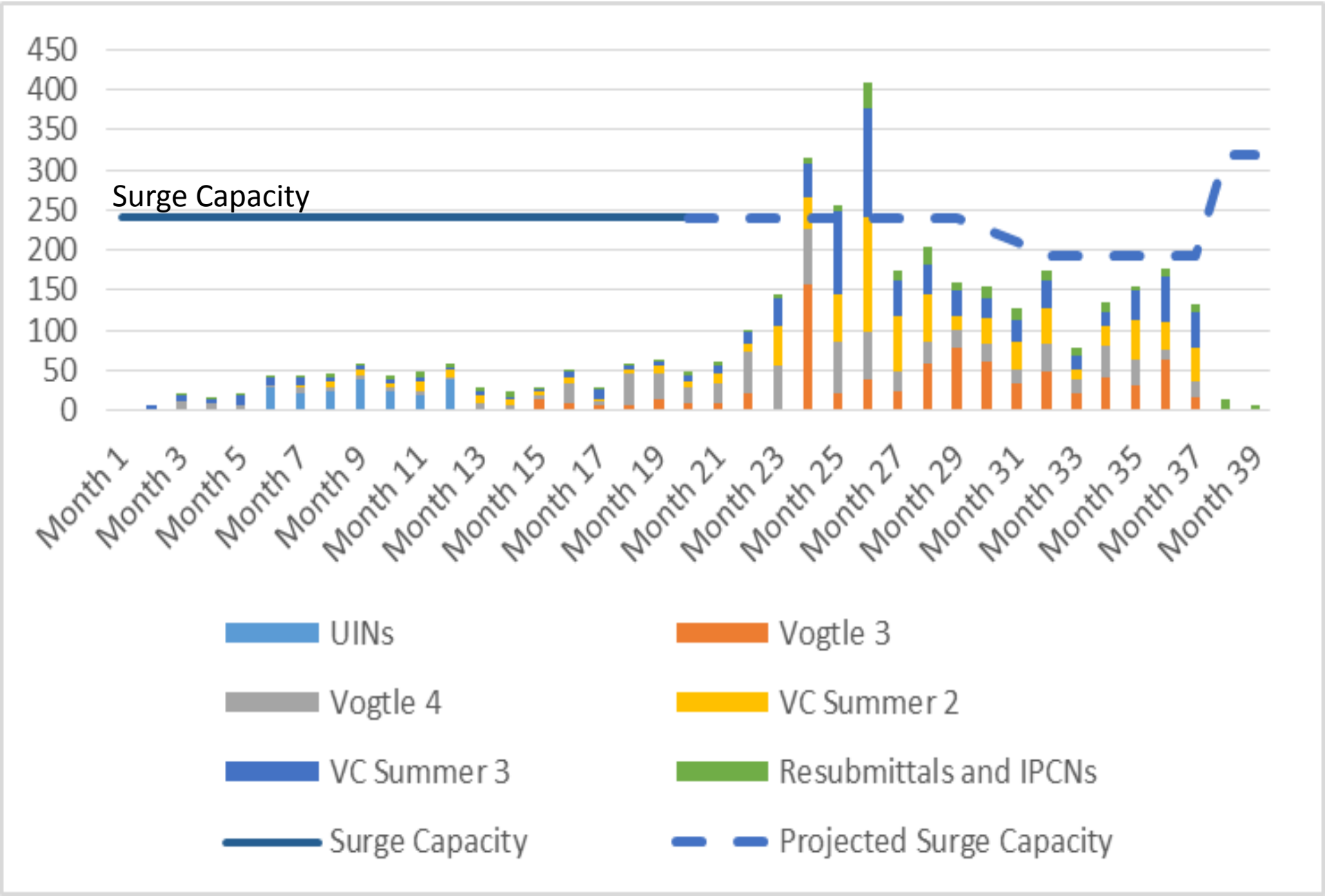
ICN Review
Graphical Analysis Assumptions

- Surge Capacity is three full time ICN reviewers
  - 4 ICNs per day per person, 12 per day total
  - 5 Days per week, 4 weeks per month = 240 ICNs/month
- Capacity based on current resources allocated for ICN reviews, past Q6 is projected (dashed line)
- Expanded Capacity may include up to 10 additional reviewers
- More complex ITAAC encountered in last 6 months before 103g
- Each lag unit's ICNs require less review time since they are likely identical to the lead unit's accepted ICNs
- IPCNs and Resubmittals are conservatively modelled as 15% for lead unit and 5% for other units, using a 2-month lag

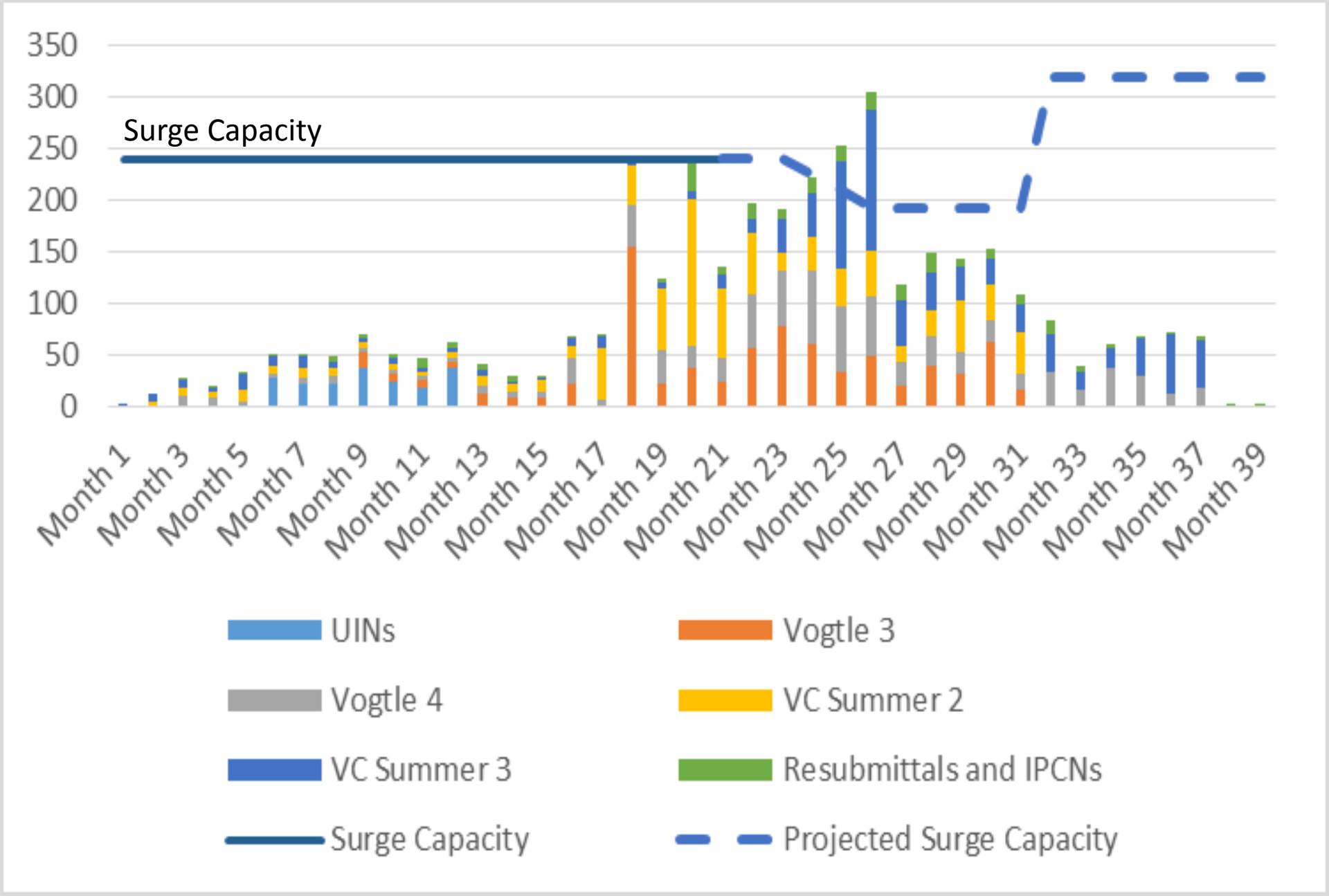
Scenario # 1 – Different 103(g) Dates



Scenario # 2 – All units with same 103(g)



Scenario # 3 – Two groups of 103(g) dates



Focus Areas and Preliminary Recommendations

1. Respond to staffing needs considering changes in construction schedules to support ICN review
   - Cross-train and maintain additional staff to support ICN workflow capacities during surge
   - Establish standing agenda items during weekly public meeting to discuss expected submittal workloads for early notification of critical process points
2. Recognize which areas of ICN reviews need priority
   - Develop internal performance dashboards for VOICES for early identification and resolution of issues

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ITAAC Closure Notification Surge Demonstration – Questions/Open Discussion with the Licensees

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Preliminary Recommendations and Next Steps

Focus Areas and Preliminary Recommendations

1. Maintain staffing needs considering changes in construction schedules to support ITAAC inspection and ICNs review
   - Establish standing agenda item during weekly public meeting to discuss expected submittal workloads
   - Continue to cross train additional staff to maintain workflow capacities for ICN processing and inspection activities during surge
2. Provide clarity in processes that would result in more timely ITAAC inspection results and ICNs review
   - Enhance NRC's guidance to provide more clarity and consistency for inspecting and processing potential ITAAC technical issues that may occur around the 103(g) finding timeframe
3. Early identification and resolution of issues
   - Develop performance dashboard for early identification and resolution of ITAAC closure related issues
   - Consider interim organizational structure to support ITAAC closure

Performance Dashboard:

For concept only, this is a potential dashboard.

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(B.3) ADDITIONAL ACTION REQUIRED:	None	Notify Division Director and do ….	Notify ORA and do….

Next Steps

- Consider feedback from today's demonstration and develop final recommendations
- Prepare and issue ITAAC Demonstration Report by June 2017
- Continue dialogue with external stakeholders associated with the ITAAC process

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Open Discussion with Licensees to Discuss Preliminary Recommendations and Next Steps

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Public Comment

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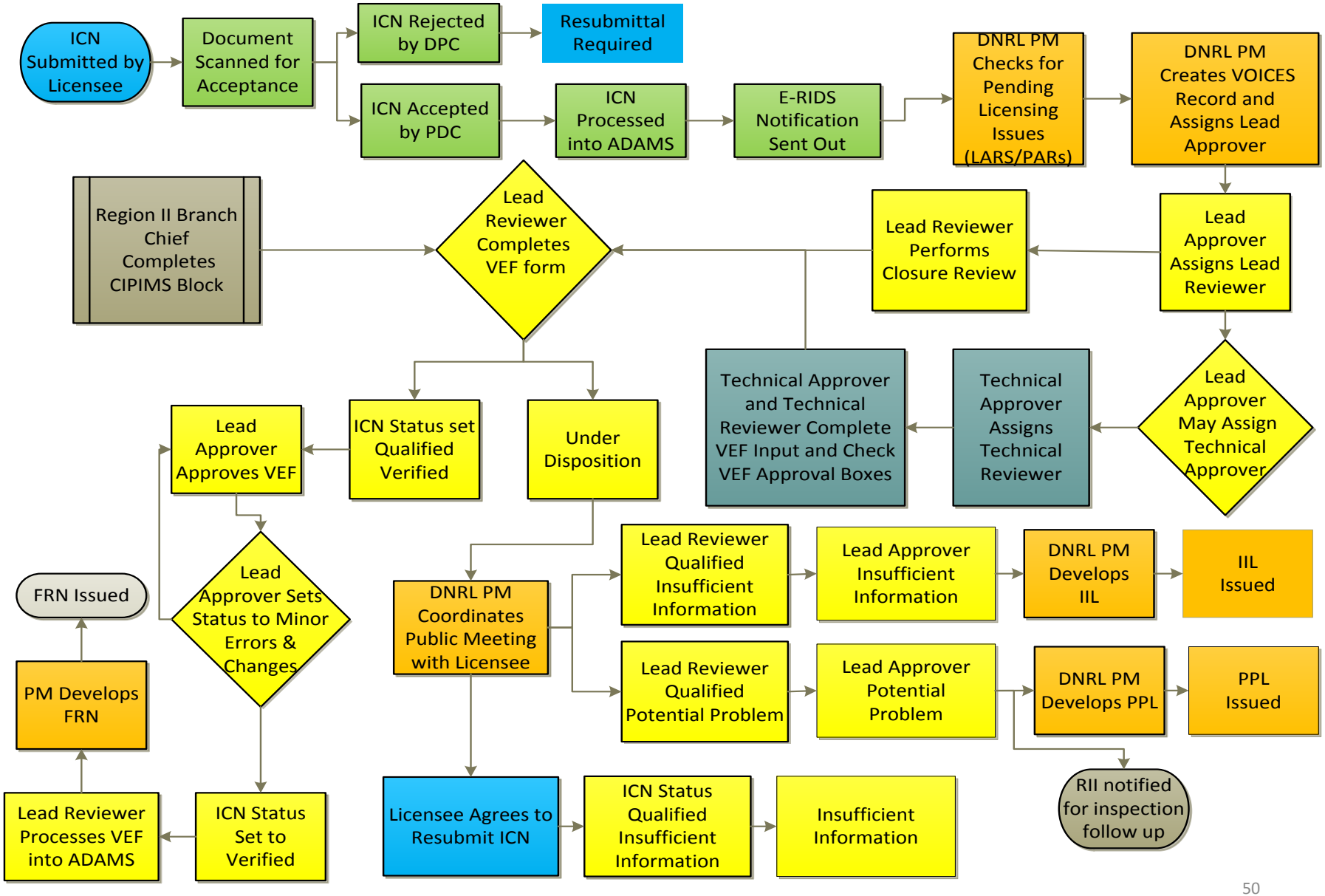
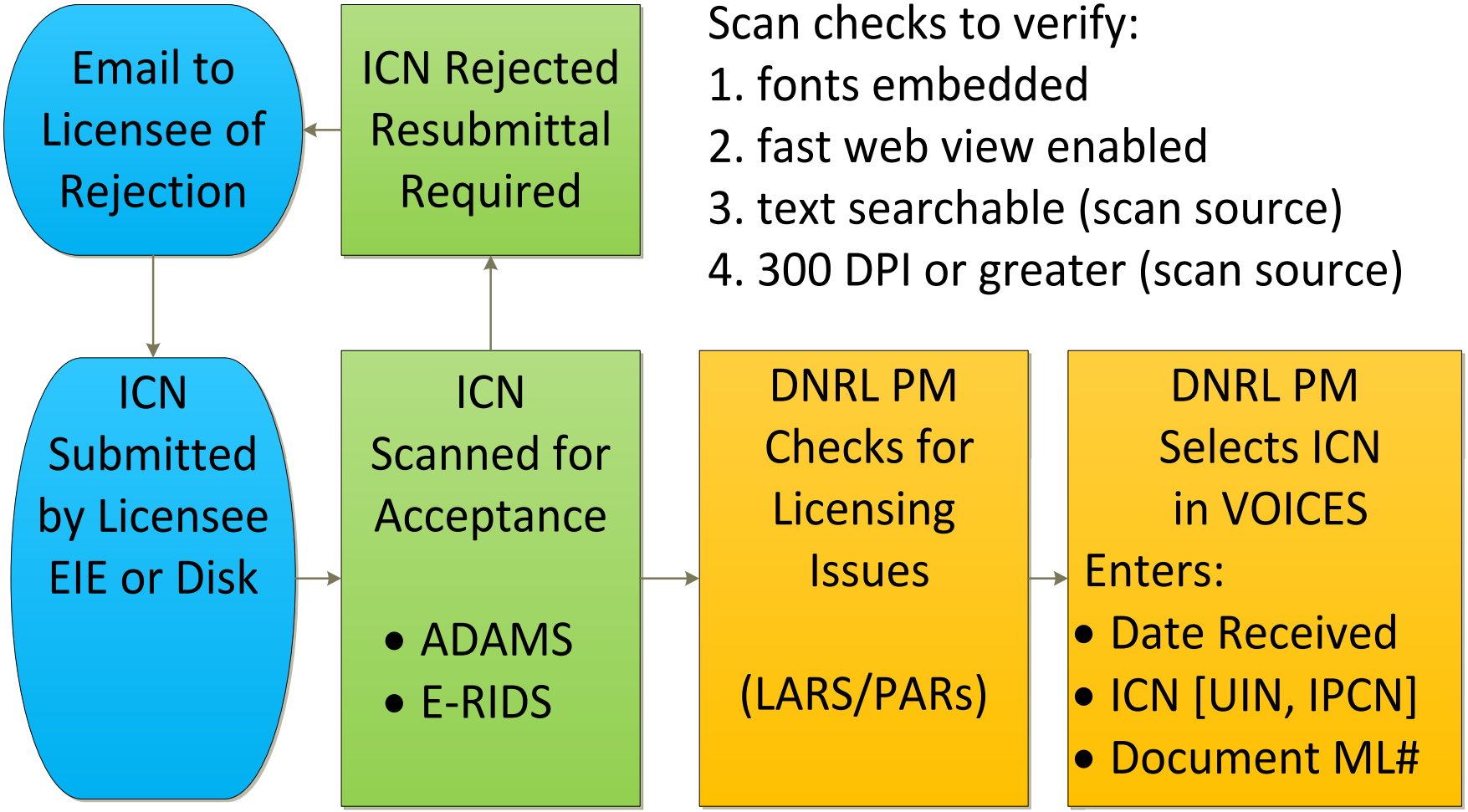
Closing Remarks

Backup slides for handouts

ICN Process Flow



Initiating The Review Process



CAPACITY: 300/Day **100 PER DAY PER PERSON DNRL**

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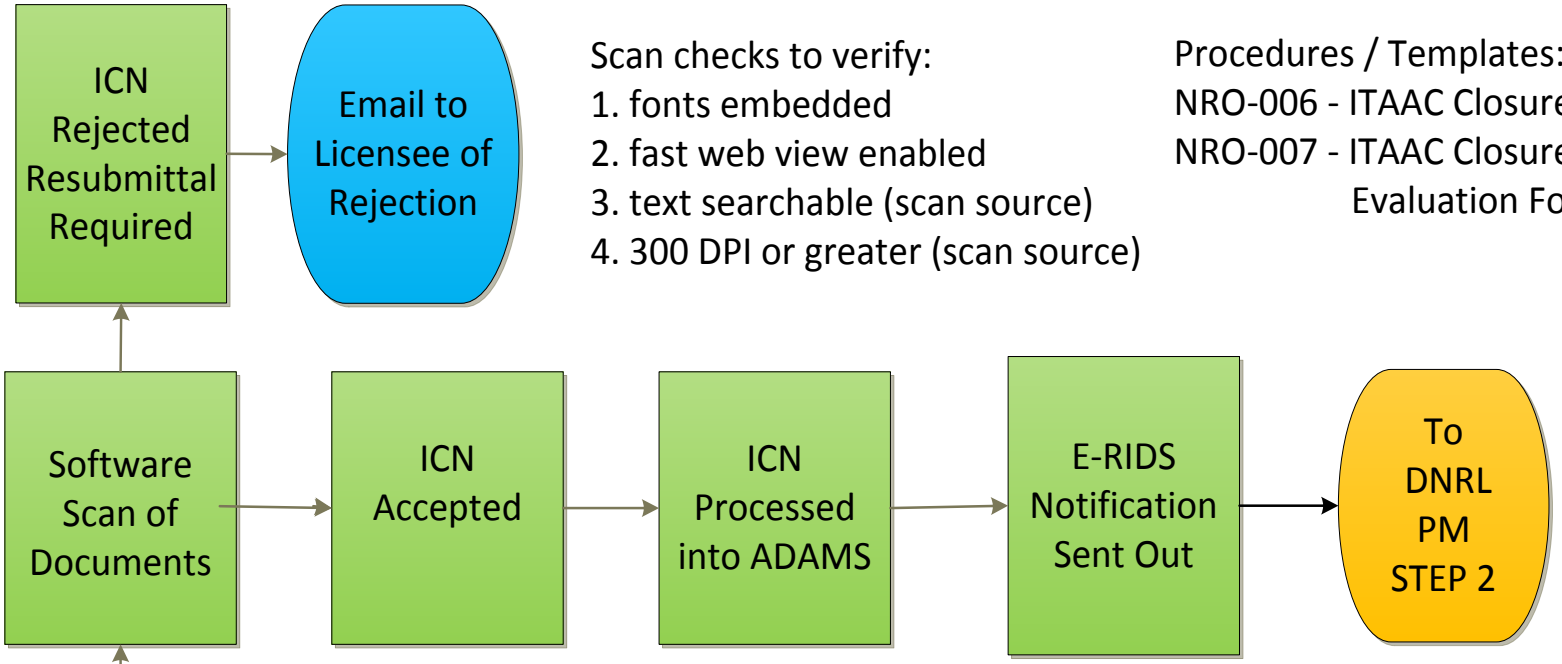
STEP 1 - Document Processing Center



Scan checks to verify:
1. fonts embedded
2. fast web view enabled
3. text searchable (scan source)
4. 300 DPI or greater (scan source)

Procedures / Templates:
NRO-006 - ITAAC Closure Notification
NRO-007 - ITAAC Closure Verification Evaluation Form

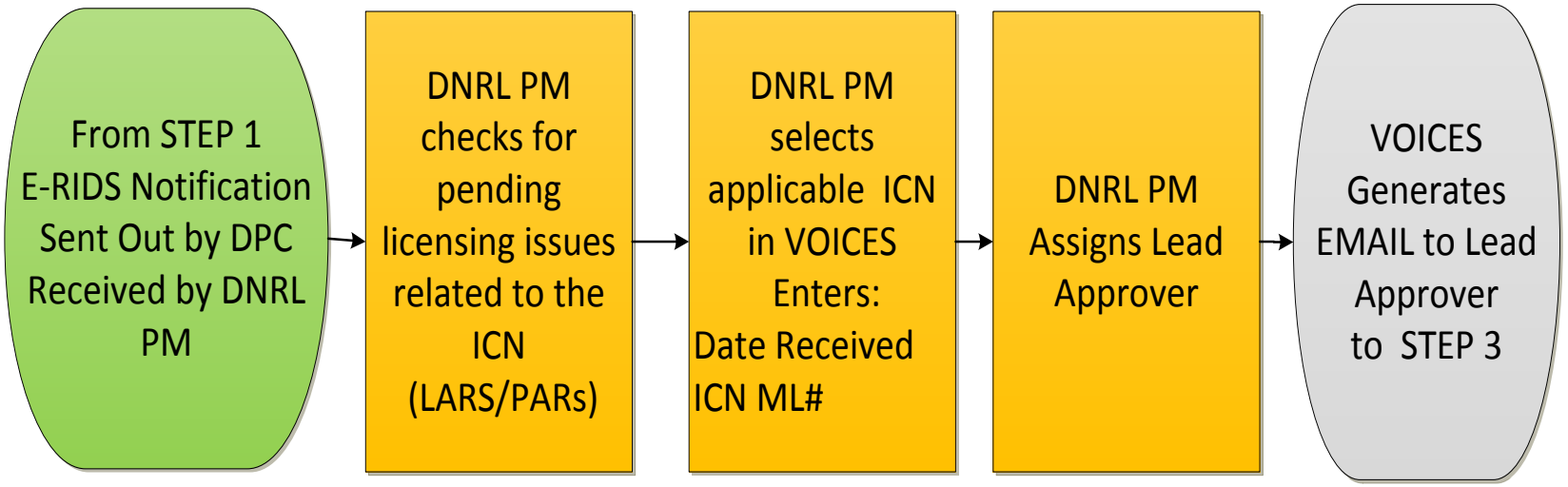
Potential Challenges
1.) Document rejected by DPC
2.) Inaccurate E-RIDS or ADAMS processing
3.) Cannot be performed remotely

EIE – Electronic Information Exchange

Capacity:
500+ ICNs/UINs processed in 1-2 days time.

If DPC knows how many documents to expect and when process can be expedited using Bulk Profile Tool.

STEP 2 - Creating ICN Records in VOICES



Capacity:

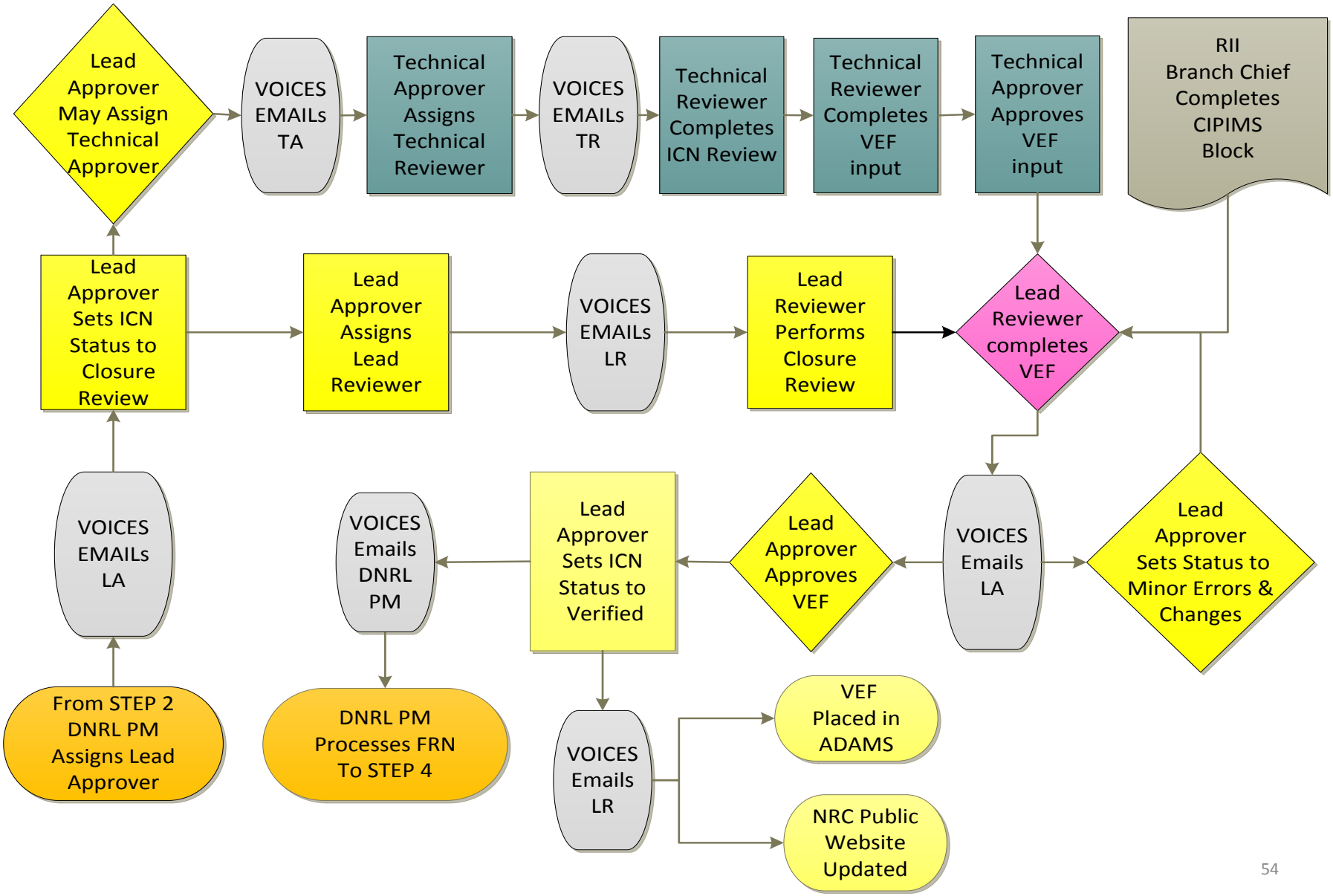
5 minutes per ICN

Approx. 100/day per person

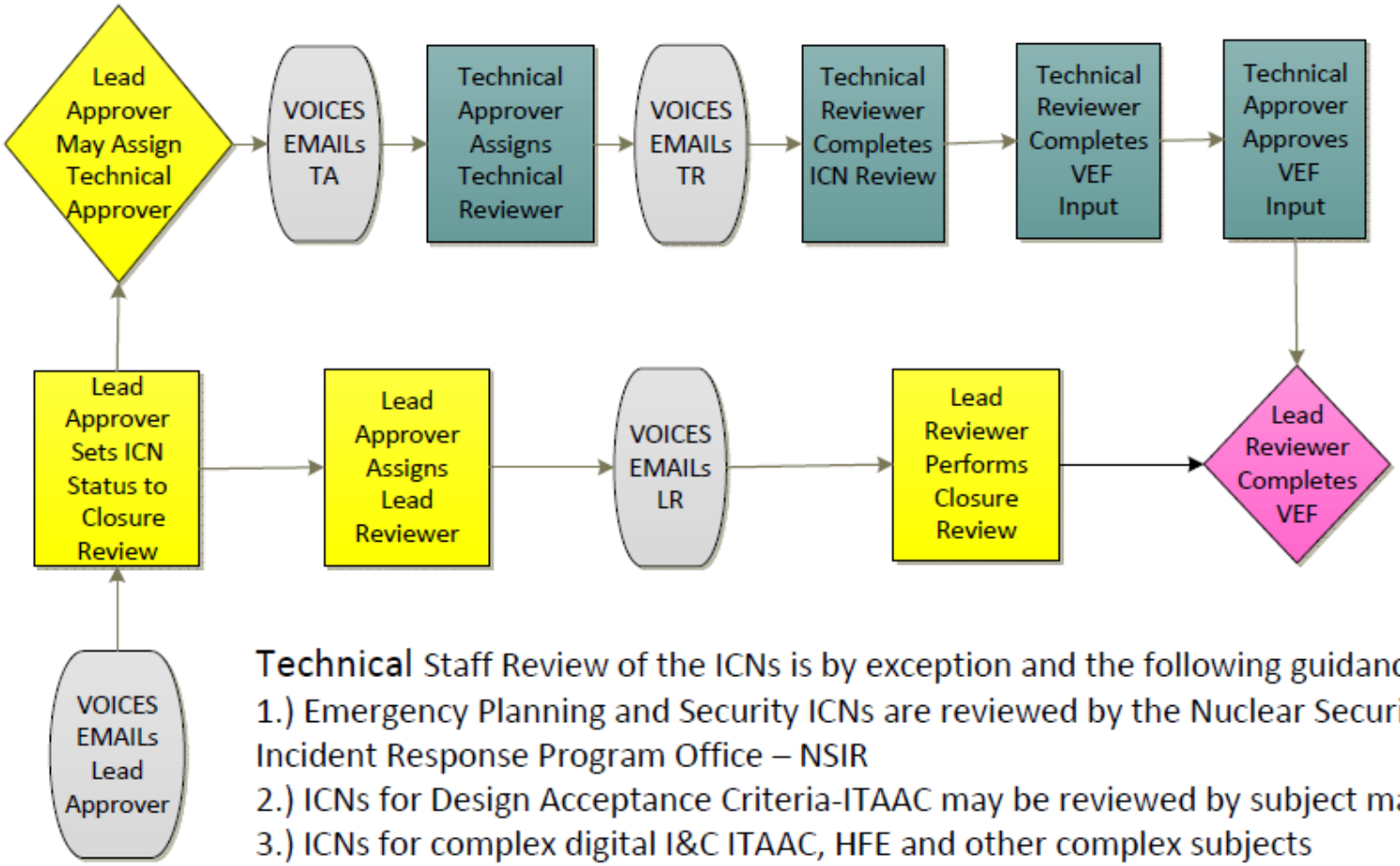
This activity can be performed remotely

Risk associated with completing this action is very low.

STEP 3 – Successful ICN Review



STEP 3 - Technical Staff ICN Review



Technical Staff Review of the ICNs is by exception and the following guidance:

1.) Emergency Planning and Security ICNs are reviewed by the Nuclear Security and Incident Response Program Office – NSIR

2.) ICNs for Design Acceptance Criteria-ITAAC may be reviewed by subject matter experts

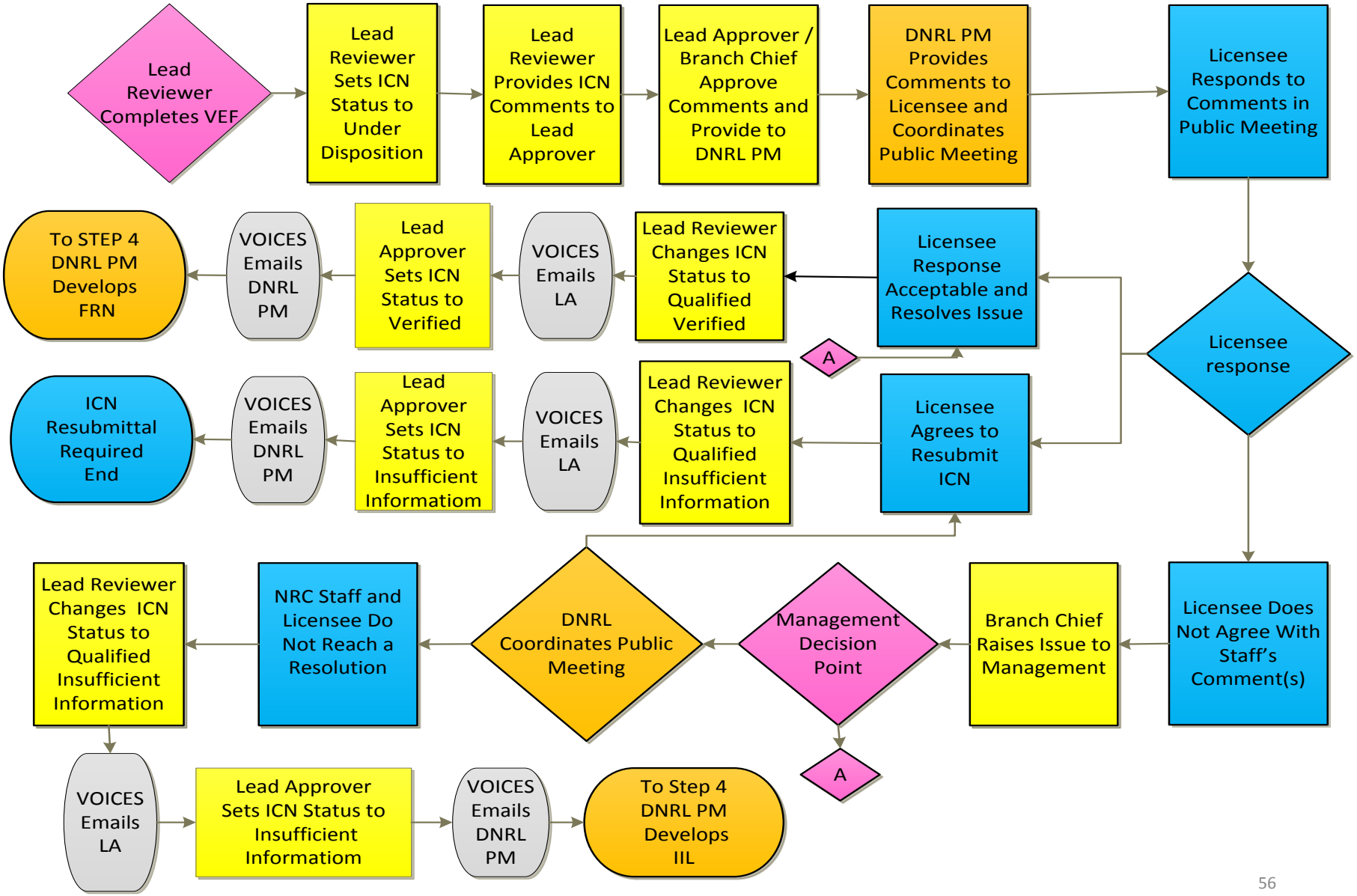
3.) ICNs for complex digital I&C ITAAC, HFE and other complex subjects

4.) ICNs for complex ITAAC activities may be reviewed by subject matter experts

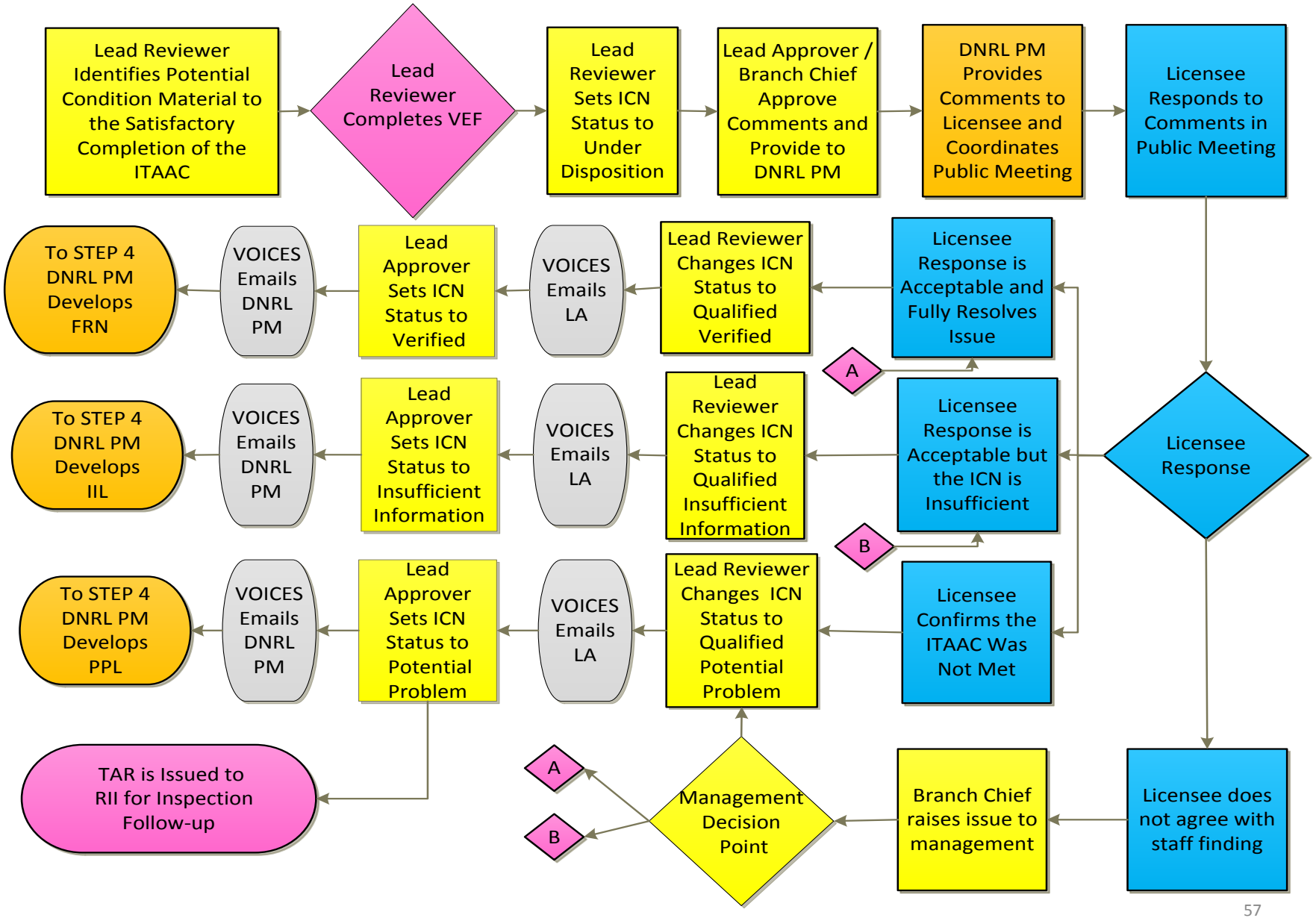
5.) ICNs with substantial technical comment by the lead reviewer

Focus of the technical staff's review is on the completeness and acceptability of the licensee's provided information within the ICN's ITAAC determination basis.

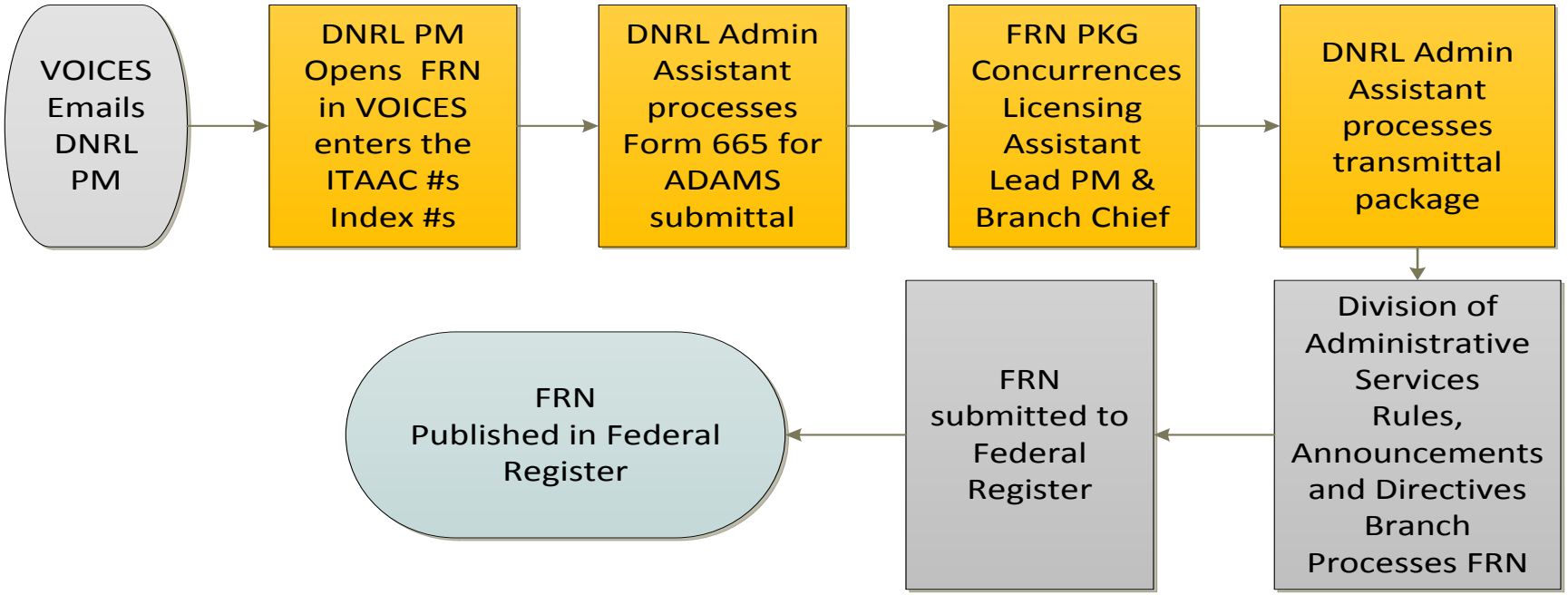
STEP 3 – Insufficient Information



STEP 3 - Potential Problem



STEP 4/5 - Federal Register Notice

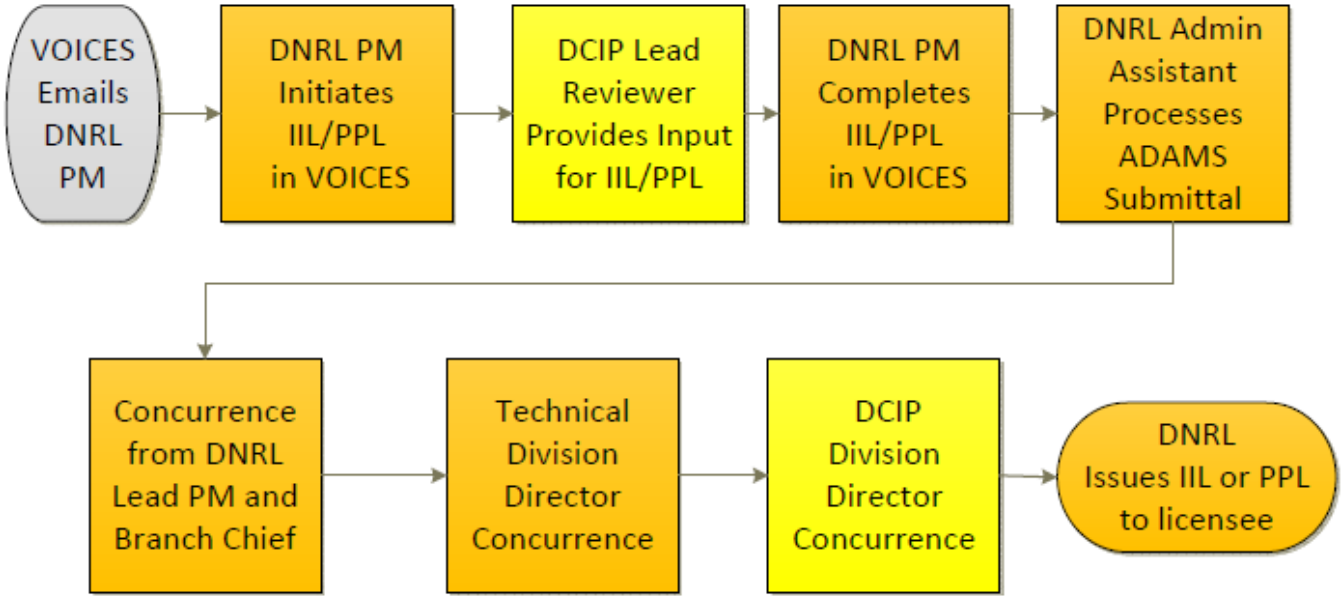


A single FRN can be used to publish the completion of an unlimited number of ITAAC. NRC therefore anticipates only issuing 2 FRNs on a weekly or bi-weekly basis.

The typical time frame to process an FRN, from start to finish, is approximately two weeks. The requirement to issue FRNs for a given UNIT ends on the last day to submit a hearing request (T-150). ICN status's will be updated in the ITAAC status report on the NRC public website.

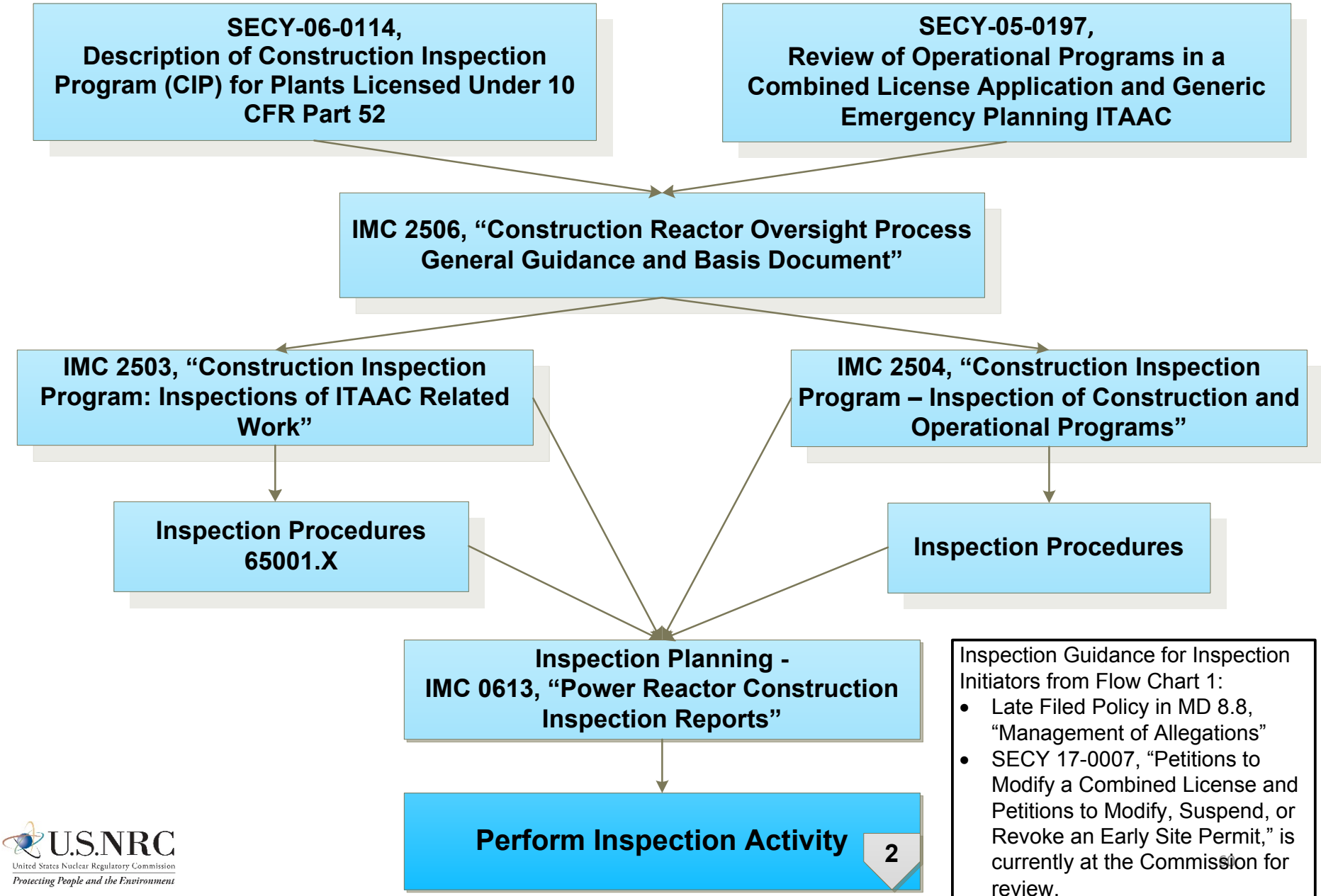
Admin services indicated the NRC is rolling out a more streamlined process in the next year, which will transform the FRN process into a digital paperless process that will improve efficiency and timeliness of the process and can be performed remotely.

STEP 4 - Insufficient Information or Potential Problem Letters



The change to public phone calls to provide routine feedback/comments on UINs and ICNs has increased efficiency and timeliness of the review process. Issuance of a formal insufficient Information or Potential Problem Letter is reserved for resolving an impasse between the staff and licensee and forwards the staff's final position on a given issue.

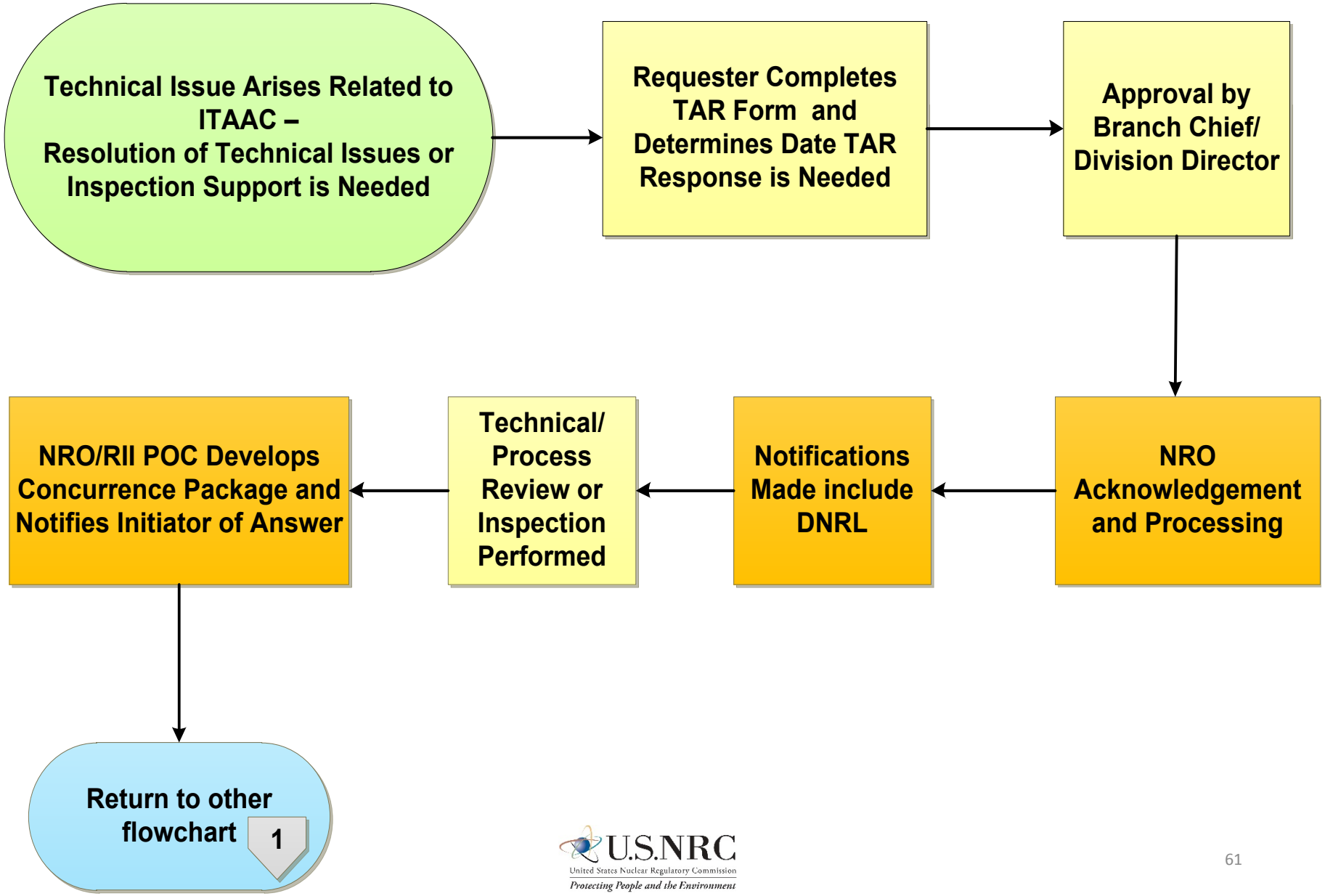
NRC Construction Inspection Guidance



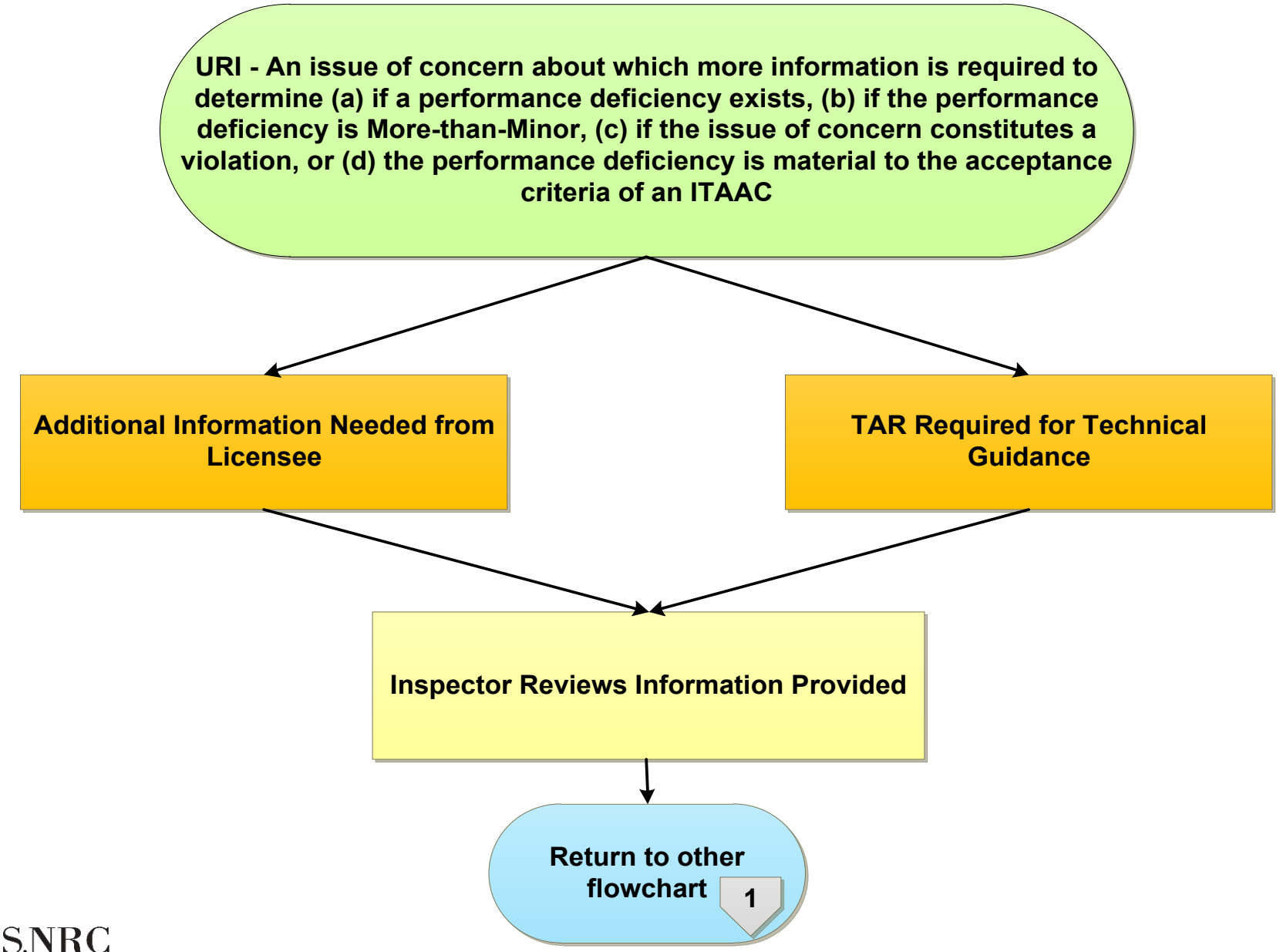
Inspection Guidance for Inspection Initiators from Flow Chart 1:

- Late Filed Policy in MD 8.8, "Management of Allegations"
- SECY 17-0007, "Petitions to Modify a Combined License and Petitions to Modify, Suspend, or Revoke an Early Site Permit," is currently at the Commission for review.

Technical Assistance Request (TAR)



Unresolved Item (URI)

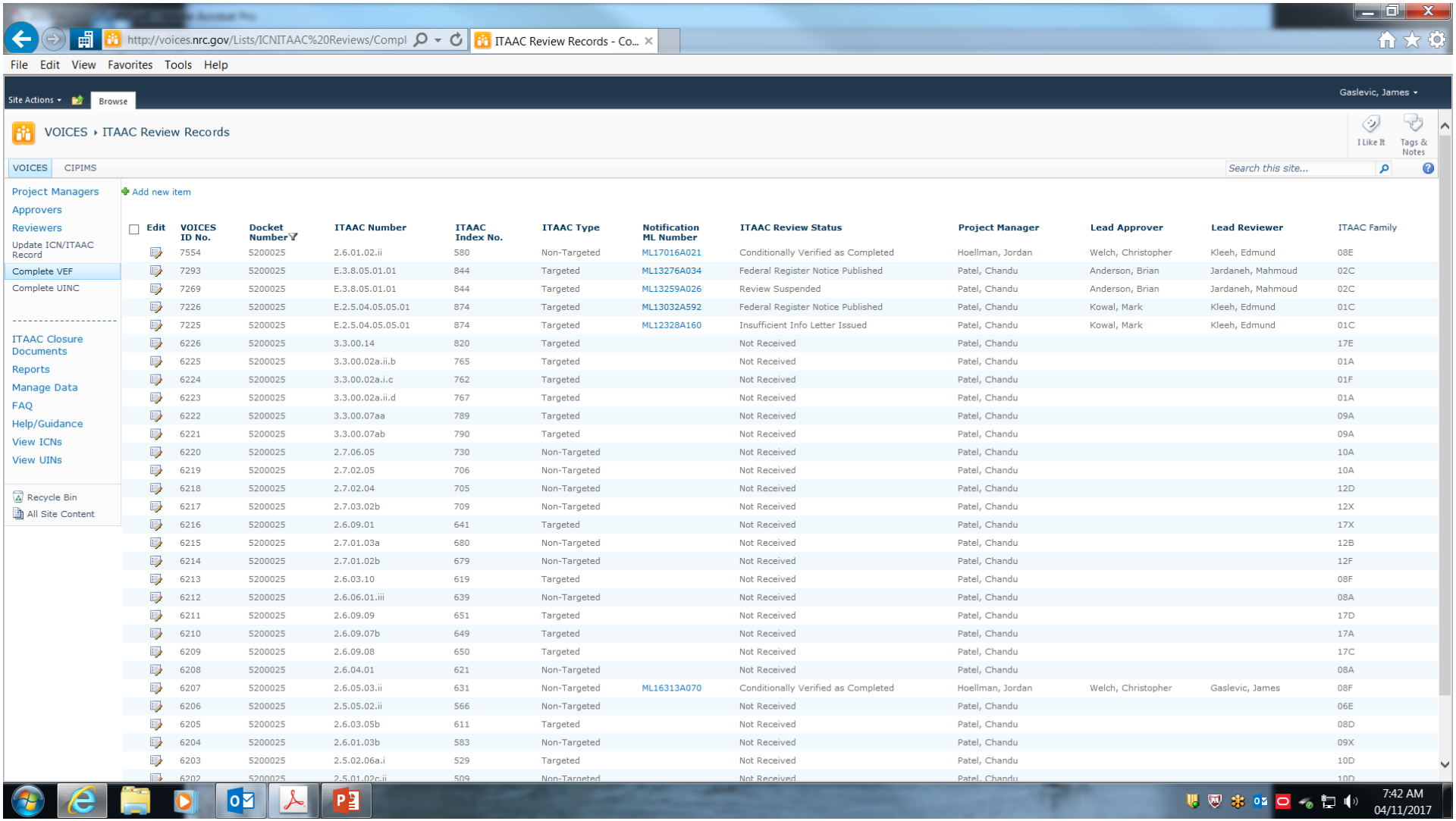


ICN Status:

PM	LA	LR	LA	VOICES
Received	Closure Review	Qualified Verified	Verified	Conditionally Verified
Deleted		Qualified Insufficient Information	Insufficient Information	Unconditionally Verified
		Qualified Potential Problem	Potential Problem	Potential Problem
		Under Disposition	Minor Errors and Corrections	Insufficient Information

UIN Status:

PM	LA	LR	LA	VOICES
Received	UIN Review	Qualified Sufficient Information	Sufficient Information	Sufficient Information
Deleted		Qualified Review Suspended	Review Suspended	Review Suspended
			Minor Errors and Corrections	


http://voices.nrc.gov/Lists/ICNITAAC%20Reviews/Compl
ITAAC Review Records - Co...
File Edit View Favorites Tools Help
Site Actions
Browse
Gaslevic, James
VOICES ▸ ITAAC Review Records
I Like It
Tags & Notes
VOICES
CIPIMS
Search this site...
Project Managers
Approvers
Reviewers
Update ICN/ITAAC Record
Complete VEF
Complete UINC
ITAAC Closure Documents
Reports
Manage Data
FAQ
Help/Guidance
View ICNs
View UINs
Recycle Bin
All Site Content
Add new item
Edit | VOICES ID No. | Docket Number | ITAAC Number | ITAAC Index No. | ITAAC Type | Notification ML Number | ITAAC Review Status | Project Manager | Lead Approver | Lead Reviewer | ITAAC Family
7554 | 5200025 | 2.6.01.02.ii | 580 | Non-Targeted | ML17016A021 | Conditionally Verified as Completed | Hoellman, Jordan | Welch, Christopher | Kleeh, Edmund | 08E
7293 | 5200025 | E.3.8.05.01.01 | 844 | Targeted | ML13276A034 | Federal Register Notice Published | Patel, Chandu | Anderson, Brian | Jardaneh, Mahmoud | 02C
7269 | 5200025 | E.3.8.05.01.01 | 844 | Targeted | ML13259A026 | Review Suspended | Patel, Chandu | Anderson, Brian | Jardaneh, Mahmoud | 02C
7226 | 5200025 | E.2.5.04.05.05.01 | 874 | Targeted | ML13032A592 | Federal Register Notice Published | Patel, Chandu | Kowal, Mark | Kleeh, Edmund | 01C
7225 | 5200025 | E.2.5.04.05.05.01 | 874 | Targeted | ML12328A160 | Insufficient Info Letter Issued | Patel, Chandu | Kowal, Mark | Kleeh, Edmund | 01C
6226 | 5200025 | 3.3.00.14 | 820 | Targeted | | Not Received | Patel, Chandu | | | 17E
6225 | 5200025 | 3.3.00.02a.ii.b | 765 | Targeted | | Not Received | Patel, Chandu | | | 01A
6224 | 5200025 | 3.3.00.02a.i.c | 762 | Targeted | | Not Received | Patel, Chandu | | | 01F
6223 | 5200025 | 3.3.00.02a.ii.d | 767 | Targeted | | Not Received | Patel, Chandu | | | 01A
6222 | 5200025 | 3.3.00.07aa | 789 | Targeted | | Not Received | Patel, Chandu | | | 09A
6221 | 5200025 | 3.3.00.07ab | 790 | Targeted | | Not Received | Patel, Chandu | | | 09A
6220 | 5200025 | 2.7.06.05 | 730 | Non-Targeted | | Not Received | Patel, Chandu | | | 10A
6219 | 5200025 | 2.7.02.05 | 706 | Non-Targeted | | Not Received | Patel, Chandu | | | 10A
6218 | 5200025 | 2.7.02.04 | 705 | Non-Targeted | | Not Received | Patel, Chandu | | | 12D
6217 | 5200025 | 2.7.03.02b | 709 | Non-Targeted | | Not Received | Patel, Chandu | | | 12X
6216 | 5200025 | 2.6.09.01 | 641 | Targeted | | Not Received | Patel, Chandu | | | 17X
6215 | 5200025 | 2.7.01.03a | 680 | Non-Targeted | | Not Received | Patel, Chandu | | | 12B
6214 | 5200025 | 2.7.01.02b | 679 | Non-Targeted | | Not Received | Patel, Chandu | | | 12F
6213 | 5200025 | 2.6.03.10 | 619 | Targeted | | Not Received | Patel, Chandu | | | 08F
6212 | 5200025 | 2.6.06.01.iii | 639 | Non-Targeted | | Not Received | Patel, Chandu | | | 08A
6211 | 5200025 | 2.6.09.09 | 651 | Targeted | | Not Received | Patel, Chandu | | | 17D
6210 | 5200025 | 2.6.09.07b | 649 | Targeted | | Not Received | Patel, Chandu | | | 17A
6209 | 5200025 | 2.6.09.08 | 650 | Targeted | | Not Received | Patel, Chandu | | | 17C
6208 | 5200025 | 2.6.04.01 | 621 | Non-Targeted | | Not Received | Patel, Chandu | | | 08A
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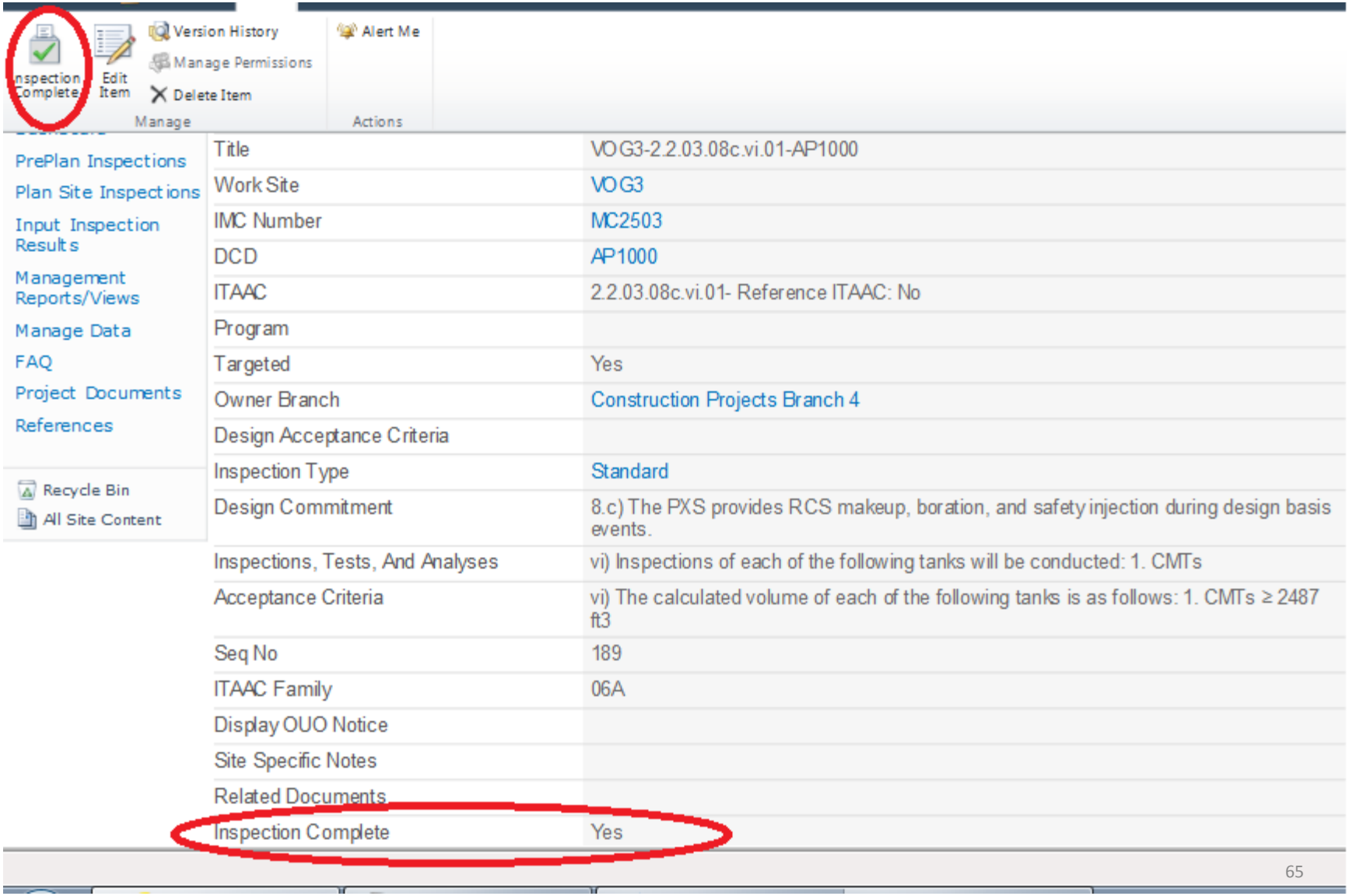
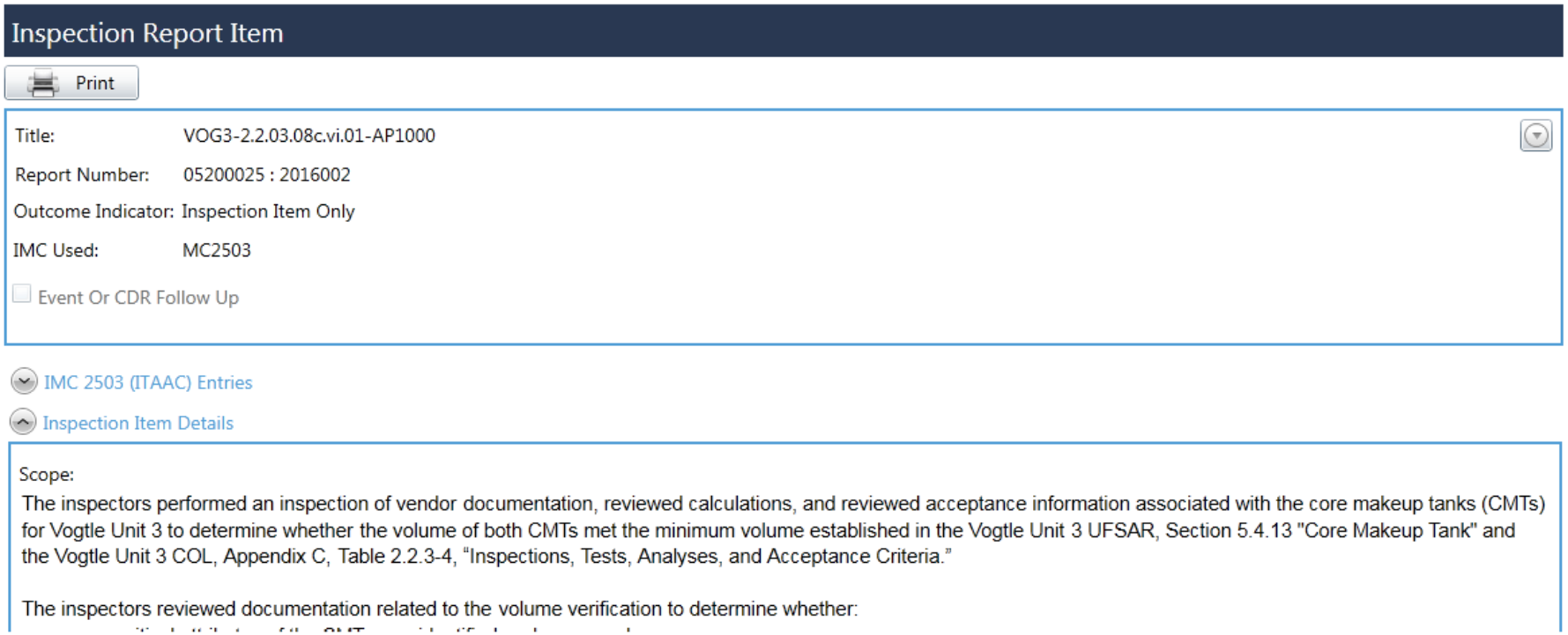
6202 | 5200025 | 2.5.01.02c.ii | 509 | Non-Targeted | | Not Received | Patel, Chandu | | | 10D
7:42 AM
04/11/2017

ITAAC in CIPIMS



CIPIMS Inspection Input



Inspection Report Item

Print

Title: VOG3-2.2.03.08c.vi.01-AP1000

Report Number: 05200025 : 2016002

Outcome Indicator: Inspection Item Only

IMC Used: MC2503

Event Or CDR Follow Up

IMC 2503 (ITAAC) Entries

Inspection Item Details

Scope:

The inspectors performed an inspection of vendor documentation, reviewed calculations, and reviewed acceptance information associated with the core makeup tanks (CMTs) for Vogtle Unit 3 to determine whether the volume of both CMTs met the minimum volume established in the Vogtle Unit 3 UFSAR, Section 5.4.13 "Core Makeup Tank" and the Vogtle Unit 3 COL, Appendix C, Table 2.2.3-4, "Inspections, Tests, Analyses, and Acceptance Criteria."

The inspectors reviewed documentation related to the volume verification to determine whether:

CIPIMS Summary

CIPIMS > CIPIMSReports > comprehensiveitaacreport

Actions ▾ | 1 of 1 | Find Next | 100%

ITAAC Progress/Findings

INPUT PARAMETERS **Unit:** *VOG3* **ITAAC:** *2.2.03.08c.vi.01*

Report Items associated with ITAAC: 2.2.03.08c.vi.01 for WorkSite VOG3

Report Number	Scope	Outcome Indicator
2016002	The inspectors performed an inspection of vendor documentation, reviewed calculations, and reviewed acceptance information associated with the core makeup tanks (CMTs) for Vogtle Unit 3 to determine whether the volume of both CMTs met the minimum volume established in the Vogtle Unit 3 UFSAR, Section 5.4.13 "Core Makeup Tank" and the Vogtle Unit 3 COL, Appendix C, Table 2.2.3-4, "Inspections, Tests, Analyses, and Acceptance Criteria." The inspectors reviewed documentation related to the volume verification to determine whether: • critical attributes of the CMT were identified and measured; • the method and controls used by the licensee to verify that the as-built dimensions conformed to the licensing basis were adequate; • the as-built tank volume and dimensions were in accordance with the final design, the ITAAC, and UFSAR; • equipment used for measurement was properly maintained and calibrated; • equipment accuracy was within procedural specifications; and • the nonconformances were resolved and their dispositions had adequate technical bases. In addition, the inspectors performed an independent calculation of the volume using the as-built dimensions of the CMTs.	Inspection Item Only
1	***Total Report Items for ITAAC***	

Public Inspection Report

- https://www.nrc.gov/docs/ML1621/ML16210A448.pdf

1A02 (Unit 3) ITAAC Number 2.2.03.08c.vi.01 (189) / Family 06A

a. Inspection Scope

The inspectors performed a direct inspection of construction activities associated with ITAAC Number 2.2.03.08c.vi.01 (189). The inspectors used the following NRC IPs/sections to perform this inspection:

- 65001.06-02.04 - Testing and Verification
- 65001.A.02.04 - Review As-built Deviations/Nonconformance
- 65001.F-02.01-Design Document Review
- 65001.F-02.02-Fabrication Records Review

The inspectors performed an inspection of vendor documentation, reviewed calculations, and reviewed acceptance information associated with the CMTs for Vogtle Unit 3 to determine whether the volume of both CMTs met the minimum volume established in the Vogtle Unit 3 Updated Final Safety Analysis Report (UFSAR), Section 5.4.13 "Core Makeup Tank" and the Vogtle Unit 3 Combined License (COL), Appendix C, Table 2.2.3-4, "Inspections, Tests, Analyses, and Acceptance Criteria."

The inspectors reviewed documentation related to the volume verification to determine whether:

- critical attributes of the CMT were identified and measured;

- the method and controls used by the licensee to verify that the as-built dimensions conformed to the licensing basis were adequate;
- the as-built tank volume and dimensions were in accordance with the final design, the ITAAC, and UFSAR;
- equipment used for measurement was properly maintained and calibrated;
- equipment accuracy was within procedural specifications; and
- the nonconformances were resolved and their dispositions had adequate technical bases.

In addition, the inspectors performed an independent calculation of the volume using the as-built dimensions of the CMTs.