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52.103(g) Process

September 10, 2019

Agenda

- **Draft Letters**
- **Prerequisites to reduce 17 days between ITAAC all complete and 103(g) finding**
- **Scenarios leading up to 103(g)**
 - Scenario 1 – ITAAC Maintenance non-reportable example
 - Scenario 2 – ITAAC Maintenance reportable example
 - Scenario 3 – ITAAC finding prior to ICN submittal
 - Scenario 4 – ITAAC finding after ICN submittal



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Draft Letters

- **10 CFR 52.99(c)(3) 315-day Letter**
- **10 CFR 52.103(a) Intent to Load Fuel**
- **10 CFR 52.99(c)(4) All ITAAC Complete**
 - Drafts per NEI 08-01



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Prerequisites to reduce 17 days
between ITAAC all complete and
103(g) finding

Prerequisites

- **SNC and NRC met on August 13, 2019, and NRC identified prerequisites for SNC to meet to reduce 17 days:**
 - SNC will have 90 day ICNs locked down by Jan 2020
 - ICNs should match their UINs, otherwise SNC should submit advance draft ICNs
 - SNC to provide advance draft copies of reports that are integral to ITAAC for ICNs submitted within the last 30 days.
 - 4 weeks prior to ALL COMPLETE, SNC to confirm ICN submittal schedule in real time via daily calls
 - 2 weeks prior to ALL COMPLETE, SNC to specify submittal dates and times for remaining ICNs and the All ITAAC Complete notification



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Scenarios 1&2 ITAAC Maintenance

ITAAC Maintenance

ITAAC Issues identified ≤ 30 Days to All ITAAC complete

- Condition Report (CR) initiated (Goal is ≤ 6 hours of receipt of issue)
 - Initiate Technical Evaluation (TE) to perform an ITAAC Maintenance Screen in accordance with NEI 08-01 on CR, Goal is ≤ 12 hours of receipt of issue
 - Goal is to complete the Materiality screening ≤ 24 hours of receipt of issue
 - SME support will be used, as needed
 - If more evaluation is required >24 hours, SNC management will be notified with plan to complete evaluation.
 - ITAAC will close the TE with the determination of:
 - Not material to ITAAC (Scenario 1)
 - Material to ITAAC (Scenario 2)



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Scenario 1 – ITAAC Maintenance non-material example

Issue determined to not be ITAAC material

- Will be managed under the site CAP process
 - Screening TE closed with screening determination and relevant technical details, including basis for “Not Material.”



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Scenario 2 – ITAAC Maintenance material example

Issue determined to be ITAAC material and reportable

- An ITAAC Maintenance Impact Form is generated and routed for review and concurrence from the ITAAC and Site Licensing Manager, goal of <48 hours after issue is identified
 - Appropriate SME support is engaged, as needed
- Prompt notification is submitted to the NRC in accordance with procedures (Current requirement prior to All ITAAC Complete Notification is 7 working days. The goal is <24 hour)
- A Post Closure Notification is required to be submitted within 30 days with a goal of 48 hours



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Vogtle 3&4

Scenarios 3&4

ITAAC-Related Violations Prior to 103(g)

Assumptions and Context

- Identification of any ITAAC-related violation just prior to issuance of the final memorandum to the Commission is considered very unlikely, based on:
 - Majority of ITAAC inspections should be complete
 - Inspection planning activities will reduce risk for remaining scope
- Possible triggers/vulnerabilities for ITAAC-related violations include:
 - Discovery during fuel load prep or system operability issue
 - Unit 4 violation that applies to Unit 3
- Two scenarios of ITAAC-related violation are considered:
 - Scenario 3: ITAAC-related Finding prior to ICN
 - Scenario 4: ITAAC-related Finding after ICN



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Scenario 3: ITAAC-related Finding prior to ICN

- No Post-Closure notification is required.
- Ensure corrective action is completed expeditiously to support ICN submittal.
- Support any NRC inspection for closure, as needed.
- ICN Preparation:
 - The corrective actions for each finding have been completed and each finding closed.
 - If finding is not closed, ICN could be based on, “The corrective actions for each finding have been completed.”



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Scenario 4: ITAAC-related Finding after ICN

- Evaluate for Post-Closure Notification and perform notifications as required.
- If PCN is not required, then the 52.103(g) finding can proceed.
- If PCN is required, SNC to ensure corrective action is completed expeditiously to support PCN submittal.
 - PCN concludes, “The corrective actions for each finding have been completed and thus the completed status of this ITAAC is maintained.”
 - Licensee may request the NRC staff to proceed with the Section 52.103(g) finding recommendation to the Commission.



 Southern Nuclear

 Georgia Power

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