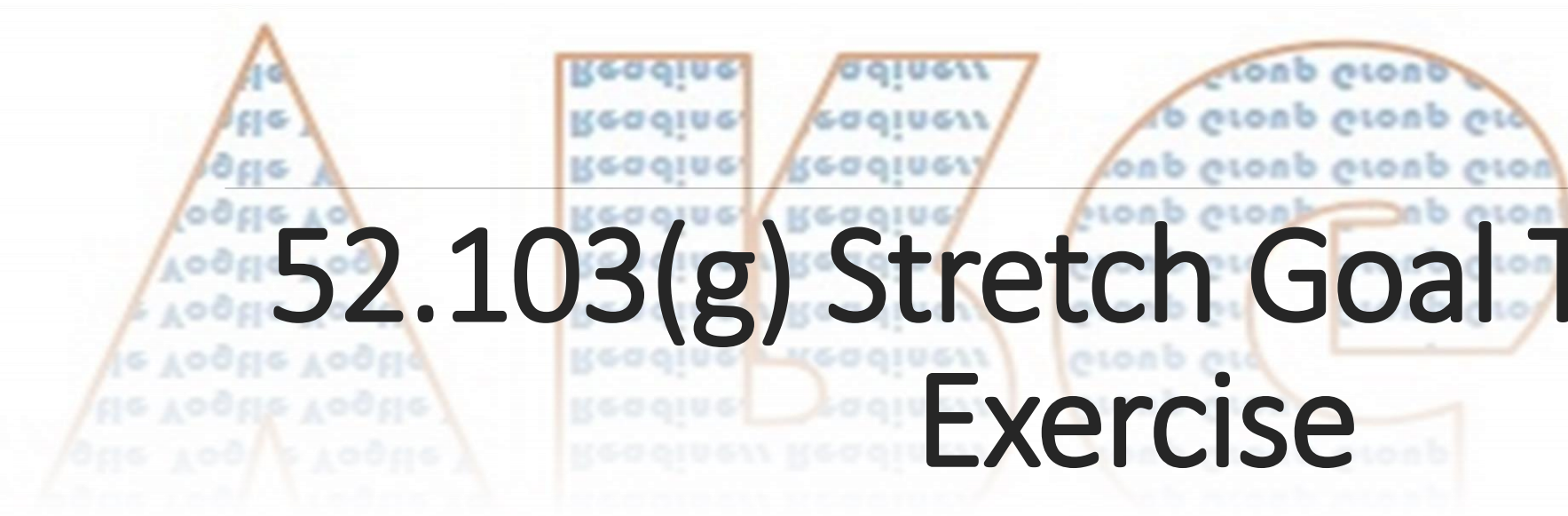
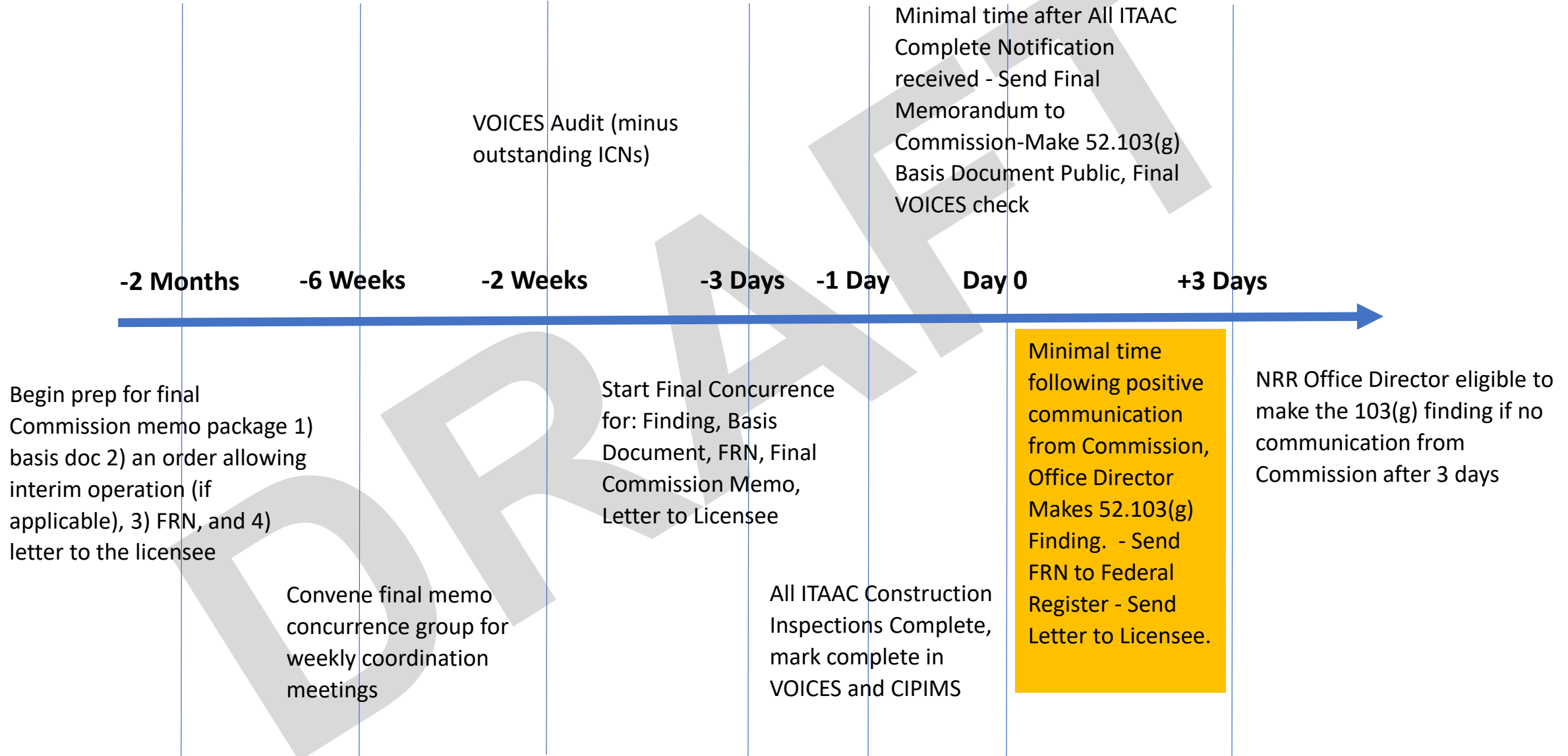




52.103(g) Stretch Goal Tabletop Exercise

52.103g Stretch Goal (Reflecting Best Case Scenario)



Discussion on SNC draft notifications

- ❖ Draft 52.103(a) Notice of Intent to Operate
- ❖ Draft 52.99(c)(4) All ITAAC Complete Notification
- ❖ Draft Notice of Uncompleted ITAAC 315-days Prior to Initial Fuel Load

Prerequisites to Reduce 52.103(g) Process Time

Ties to the All ITAAC Complete Notification

- @ 14 days in advance, specify date and time for submitting the All ITAAC Complete notification
- @ 14 days in advance, specific ICN's to be submitted with the All ITAAC Complete notification
- @ 4 weeks in advance, SNC to confirm in real time on ICNs submitted to NRC licensing

Final ICNs

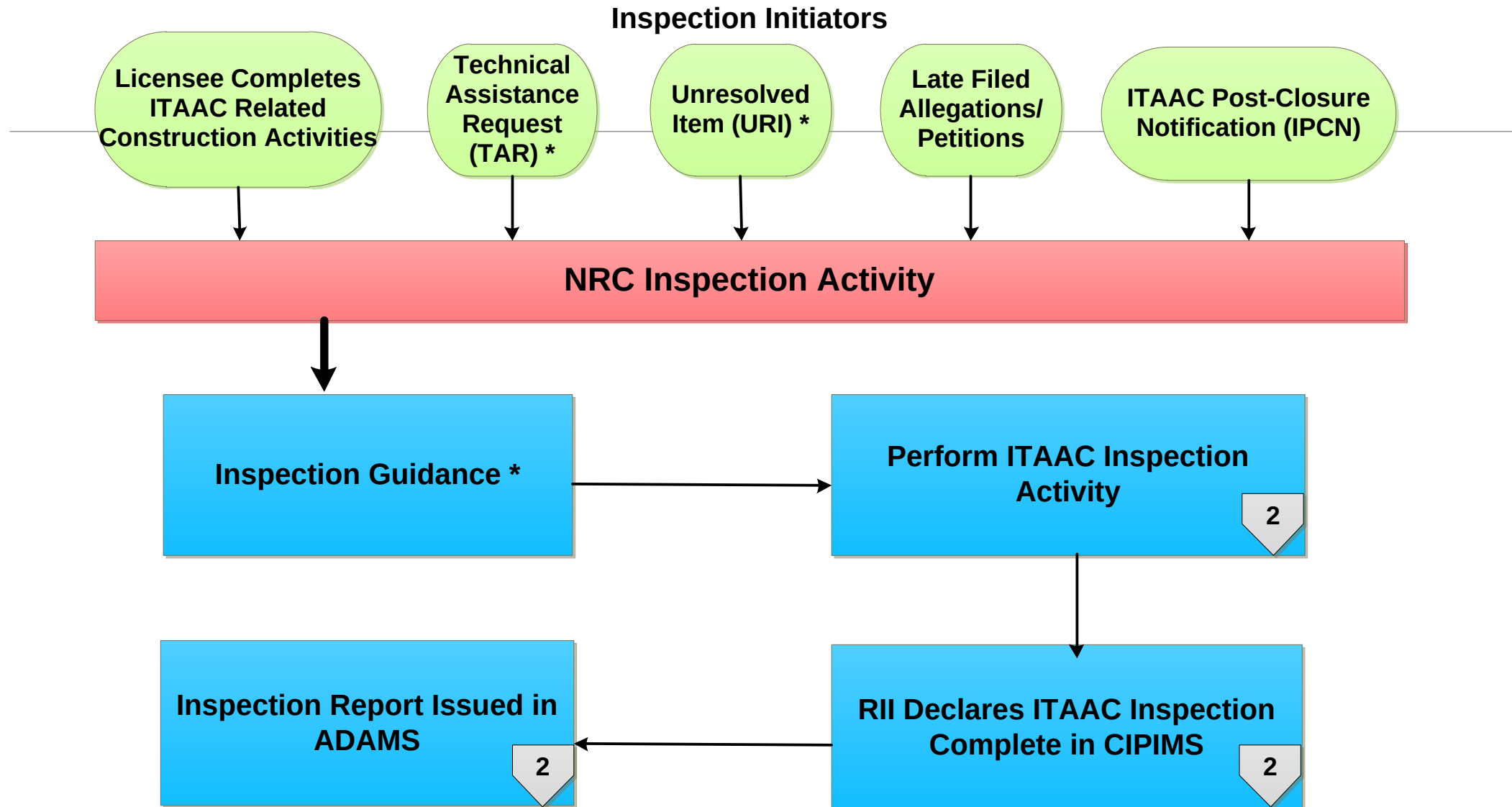
- During the last month have daily calls with SNC regarding status updates and progress on ITAAC completion
- ICNs should match their UINs, otherwise SNC should submit advance draft ICNs

SNC to provide advance draft copies of reports that are integral to ITAAC for ICN's submitted within that last 30 days

Scenarios 1&2 ITAAC Maintenance

- ❖ Material Error or Omission: Is there a material error or omission in the original ITAAC Closure Notification?
- ❖ Post Work Verification (PWV): Will the PWV use a significantly different approach than the original performance of the ITA as described in the original ITAAC Closure Notification?
- ❖ Engineering Change: Will an engineering change be made that materially alters the determination that the acceptance criteria are met?
- ❖ Additional Items to be Verified: Will there be additional items that need to be verified through the ITAAC?
- ❖ Complete and Valid ITAAC Closure Representation: Will any other licensee activities materially alter the ITAAC determination basis?

Scenarios 3&4 – ITAAC Findings



Scenarios 3&4 – ITAAC Findings

Process
Technical
Issue, If
Separable

ITAAC Finding Identified
that Affects AC

Licensee Acknowledges
Finding (CAP) and Corrects
Issue or LAR

Licensee Notifies NRC the
ITAAC is Met

Perform ITAAC Inspection
Activity
Day X

Inspection Report Issued in ADAMS
Day X + 25 - 135 Days

ITAAC Finding Identified
that Affects AC

Process
Finding to
Determine
Significance

At the Same Time,
Continue to Follow
Existing Processes

Significance
of Finding?

Green

Inspection
Report Issued
in ADAMS With
Green NCV
25 - 135 Days

Escalated
Enforcement
Process for
cROP/
Traditional; Final
Significance
Issued (Day Y)

Greater
than
Green

Inspection
Report Issued in
ADAMS With
Enforcement
Actions
Day Y + 45 Days

Additional Scenarios

- ❖ Scenario 5 – Credible Late Filed Allegation
- ❖ Scenario 6 – LAR Impacting ITAAC
- ❖ Scenario 7 – ICN Methodology Different from UIN