TO: NRC

FROM: New Reactor License MNO-xyz, **EFG** Nuclear Plant

SUBJECT: Completion of ITAAC Item 2.3.4(4)

This letter is to notify the NRC of the completion status of **EFG** Nuclear Plant Inspection, Test, Analysis and Acceptance Criteria (ITAAC) Item 2.3.4(4) for the FPS system, which is identified in the updated ITAAC Completion Schedule required by 10 CFR 52.99 submitted on _____(date).

The closure process for this ITAAC is based on the guidance described in NEI-xxy.

The design commitment for this ITAAC Item is as follows:

The FPS provides for manual fire fighting capability in plant areas containing safety-related equipment.

The Inspections, Tests, and Analyses prescribed for this Item has two parts:

i) Inspection of the passive containment cooling system (PCS) storage tank will be performed.

ii) Testing will be performed by measuring the water flow rate as it is simultaneously discharged from the two highest fire-hose stations and when the water for the fire is supplied from the PCS storage tank.

The prescribed Acceptance Criteria for the first part of the subject ITAAC is/are:

i) The volume of the PCS tank above the standpipe feeding the FPS and below the overflow is at least 18,000 gal.

The volume of the PCS tank above the standpipe feeding the FPS and below the overflow has been confirmed and documented in Reference 1; the as-built volume was determined to be at least 18,276 gallons. Reference 1 is available for NRC review at the **EFG** plant site.

The prescribed Acceptance Criteria for the second part of the subject ITAAC is:

ii) Water is simultaneously discharged from each of the two highest fire-hose stations at not less than 75 gpm.

A test was conducted and is documented in Reference 2. This test consisted of aligning the FPS to be supplied by water from the PCS Storage Tank as opposed to the FPS Fire Main. The tank was filled to the overflow point at the start of the test, and the hoses were turned on simultaneously and flowed until the tank level fell to the standpipe elevation.

Formatted: Left: 1", Right: 1", Bottom: 0.88"

Formatted: Font: (Default) Arial, 11 pt

Formatted: Font: 11 pt

Deleted: Attachment 7

Inserted: Attachment 7

Formatted: Font: (Default) Arial, 11 pt

Formatted: Right

Formatted: Left: 1", Right: 1"

The maximum and minimum flow for Hose Station #1 was 79.3 gpm and 75.4 gpm, respectively. The maximum and minimum flow for Hose Station #2 was 79.9 gpm and 75.7 gpm, respectively. The completed test procedure is available for NRC review at the **EFG** plant site.

Based on the above information, **EFG** Nuclear Plant hereby notifies the NRC that the prescribed inspections, tests and analyses have been performed and that the prescribed acceptance criteria have been met.

We request NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99 and in accordance with the NRC process and schedule guidance for ITAAC completion, evaluation and notification.

If there are any questions, please contact _____.

YVT
Site Vice President

References:

1. Calculation CALC-PCS-ITAAC-**EFG**xyz
2. Procedure FPS-TEST-ITAAC-**EFG**xyz

Formatted: Right