

Sample ITAAC Closure Letter

XX/YY/ZZZZ (Date)

To: NRC

From: {Name of Licensee}
{Site Name and Unit #(s)}
{Docket #(s)}

Subject: Completion of ABWR ITAAC 2.3.3 Item 3

The purpose of this letter is to notify the NRC of the completion of {Site Name and Unit #(s)} Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) Item 2.3.3 Item 3a and 3b for the Containment Atmospheric Monitoring System (CAMS), in accordance with 10 CFR 52.99(c)(1). The closure process for this ITAAC is based on the guidance described in NEI-08-01 (Reference 1).

ITAAC Statement

The following information is taken directly from the ABWR Reference License (R-COL) (Reference 2). The R-COL modifies the ABWR DCD by deleting channel independence for CAMS oxygen and hydrogen channels.

Design Commitment

Each CAMS division of radiation channels is powered from its respective divisional Class 1E power source. In the CAMS, independence is provided between Class 1E divisions, and between Class 1E divisions and non-Class 1E equipment.

Inspection/Test/Analysis

Item 3a - Tests will be performed on each of the CAMS radiation channels by providing a test signal to only one Class 1E division at a time.

Item 3b - Inspection of the as-built Class 1E radiation channels will be performed.

Acceptance Criteria

Item 3a – The test signal exists only in the Class 1E division under test in the CAMS.

Item 3b – In the CAMS, physical separation or electrical isolation exists between Class 1E divisions. Physical separation or electrical isolation exists between these Class 1E divisions and non-Class 1E equipment.

ITAAC Determination Basis

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Item 3a – Testing consisted of independent test signal introduction into each radiation channel to confirm division and channel independence and separation. Testing was performed in accordance with Pre-Operational Test Procedure ABWR PTP-CAMS-0001 (Reference 4). Testing has been performed on both CAMS radiation channels to confirm test signal introduction into each division and channel does **not** result in a signal being detected in the other division and channels of CAMS. Test results indicate Acceptance Criteria contained in ITAAC 2.3.3 Item 3a has been satisfied.

Item 3b – Inspections have been performed to ensure that **physical** separation exists between Class 1E CAMS radiation channels and between Class 1E CAMS divisions and non-Class 1E equipment. The design and installation of CAMS related equipment was in accordance with Regulatory Guide 1.75 (Reference 5) as identified in section 8.3 of the ABWR DCD. These inspections consisted of a review of construction in-process installation and Quality Control records, where separation requirements are built into the process used for raceway and cable design and routing.

Construction drawings and Installation Specifications provide the installer/contractor with identified separation criteria, consistent with the ITAAC commitment and were met during construction activities.

Raceway completion and cable route were validated by Quality Control walk-down of the designated raceways prior to pulling Class 1E cables.

Cable routing within cabinets was independently verified by Quality Control for separation attributes through a series of documented inspections as cables were installed and terminated.

Based on a review of construction installation and independent Quality Control records, the Licensee has determined the Acceptance Criteria contained in ITAAC 2.3.3 Item 3b were met.

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ITAAC Related Construction Finding Review

In accordance with plant procedures for ITAAC close-out, {Licensee} performed a review of ITAAC-related construction findings and associated corrective actions. This review determined that three such findings, listed below, have been identified.

1. {ITAAC-related construction finding #1}
2. {ITAAC-related construction finding #2}
3. {ITAAC-related construction finding #3}

The corrective actions for each finding have been completed and each finding closed. This review is documented in the close-out package for ITAAC 2.3.3 Item 3a and 3b (Reference 3), which is available for NRC review.

ITAAC Closure Statement

Based on the above information, {Licensee} hereby notifies the NRC that ITAAC 2.3.3 Item 3a and 3b were performed for {Site Name and Unit #(s)}, and that the prescribed acceptance criteria were met.

We request NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact {Name of Contact Person for licensee} at {Telephone Number for Contact Person}.

Sincerely,

{Signature of Licensee Representative}
{Typed Name of Licensee Representative}
{Title of Licensee Representative}

References (available for NRC review)

1. NEI-08-01, Industry Guideline for the ITAAC Closure Process under 10 CFR Part 52
2. ABWR Reference Combined License (R-COL)
3. ITAAC 2.3.3 Item 3a and 3b Closeout Package
4. ABWR PTP-CAMS-0001, ABWR CAMS Pre-Operational Test Procedure
5. Regulatory Guide 1.75, Criteria For Independence Of Electrical Safety Systems