225 Day Notification
ITAAC-ABWR 2.1.1d Item 3

XX/YY/ZZZZ (Date)

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

Subject: Notification of Uncompleted ABWR ITAAC 2.1.1d Item 3

ITAAC Statement

Design Commitment

The ASME Code components of the RPV (Reactor Pressure Vessel) *System retain their pressure boundary integrity under internal pressure that will be experienced during service.*

Inspection/Test/Analysis

A hydrostatic test will be conducted on those code components of the RPV System required to be hydrostatically tested by the ASME Code.

Acceptance Criteria

The results of the hydrostatic test of the ASME Code components of the RPV System conform with the requirements in the ASME Code, Section III.

Actions Achieved Toward ITAAC Closure

The ASME Code components of the RPV system were installed in a fabrication shop where the compliance to Code requirements is inherent in procedures, training, inspections, and documentation. The fabrication shop is approved for ASME Code work. This results in the N – Stamping of the RPV. The fabrication of ASME components for the RPV system complies with design drawings and specifications and has been verified by Quality inspections and documentation.

Initial hydrostatic testing of ASME Code components for the RPV system was completed in the approved fabrication shop. During the fabrication, the EPC constructor performed inspections for material traceability, NDE requirements, welding quality, and compliance to design drawings and specifications.

The final RPV System hydrostatic test (post appurtenance hydro) in the field is not complete at this time. It will not be complete until approximately 2 months prior to fuel load in accordance with the project schedule.

Progress as of (Month, Day, Year) toward completing this ITAAC is approximately 25% with the Hydrostatic Test Procedure per XXX.XXX.XXX

(Reference 1) and the Hydrostatic Test Package (Reference 2) generated, but the final RPV System hydrostatic test, associated inspection activities, and test analysis results remain open. Completion of the final RPV System hydrostatic test will be per the construction schedule. Test personnel have significant experience with such hydrostatic testing procedures, test packages, testing, inspections, and test result analysis. Completion of a successful final RPV System hydrostatic test confirms that ASME Code components of the RPV System retain their pressure boundary integrity under internal pressure that will be experienced during service.

The ASME Code components of the RPV System were identified for both the initial shop test and final RPV System test. These components were within the hydrostatic test boundaries established by the constructor based on plant design drawings and specifications. These design documents provide design and operating temperatures and pressures which allow assembly of the Hydrostatic Test Package per Procedure XXX.XXX.XXX, Hydrostatic Testing. Hydrostatic testing personnel are trained in accordance with the Hydrostatic Testing Procedure, test results are analyzed, documented, and retained. The Hydrostatic Test Package consists of the following:

1. Hydrostatic Test Package Index Sheet
2. ASME Section III Hydrostatic Test Report
3. Drawing showing the system test boundary

The final RPV Hydrostatic System Test Package documentation was prepared by the Hydrostatic Test Engineer, test rig and component set up was by the Hydrostatic Test Crew, inspection for leaks was by the Quality Inspector, and verification of test results was by the ANI (Authorized Nuclear Inspector).

Actions Remaining to Attain ITAAC Closure

Prior to final acceptance of the final hydrostatic test results of the ASME Code components of the RPV System, a test package documentation review will ensure compliance to ASME Code, Section III. Any deviations identified will be resolved prior to system turnover to Start Up. The Hydrostatic Test Package documentation review by Quality Assurance will be per Quality Procedure XXX (Reference 3).

ITAAC Closure Schedule

ITAAC 2.1.1d Item 3 is being tracked in the ITAAC database. ITAAC 2.1.1d Item 3 Closeout Package (Reference 4) is scheduled to be issued by [month, day, year]. The Closure Letter for ITAAC 2.1.1d Item 3 will follow our review and acceptance of these documents.

Construction and Operations Hydrostatic Test programs are based upon procedures written and approved by Licensee (or their designee). Personnel

performing the Hydrostatic Tests are trained per the approved procedures. Such programs with appropriate third party inspections and documentation have been in use for industry outages for many years. These successful industry programs coupled with satisfactory hydrostatic test results through (Month, Day, Year) showing completion of the major portions of this ITAAC at our facility provides confidence that [Licensee] will successfully complete this ITAAC.

References (available for NRC review)

1 Procedure XXX.XXX.XXX, Hydrostatic Testing
2 RPV Hydrostatic Test Package
3 Quality Assurance Procedure XXX
4 ABWR ITAAC 2.1.1d Item 3 Closeout Package