

**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

Progress as of (Month, Day, Year) toward completing this ITAAC is approximately 75% with the shop fabrication activities complete, 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.

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

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

225 Day Notification
ITAAC-ABWR 2.1.1d Item 3

testing personnel are trained in accordance with the Hydrostatic Testing procedure, and 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

Initial hydrostatic testing of ASME Code components for the RPV system was completed in the approved fabrication shop. During 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 was not completed in the fabrication shop. It is scheduled to be complete approximately 2 months prior to fuel load in accordance with the construction schedule.

Staff qualified test personnel have experience with such hydrostatic testing procedures, test packages, testing, inspections, and test analysis results. 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.

Actions Remaining to Attain ITAAC Closure

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

Prior to acceptance of the final hydrostatic test analysis 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).

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.

225 Day Notification
ITAAC-ABWR 2.1.1d Item 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.

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