CHAPTER 14: INITIAL TEST PROGRAM
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CHAPTER 14 INITIAL TEST PROGRAM

14.1 SPECIFIC INFORMATION TO BE INCLUDED IN PRELIMINARY/FINAL SAFETY ANALYSIS REPORTS

This section of the referenced DCD is incorporated by reference with no departures or supplements.

14.2 SPECIFIC INFORMATION TO BE INCLUDED IN STANDARD SAFETY ANALYSIS REPORTS

This section of the referenced DCD is incorporated by reference with the following departures and/or supplements.

14.2.2 ORGANIZATION, STAFFING, AND RESPONSIBILITIES

Replace the existing information in DCD Subsection 14.2.2 with the following new paragraph and subsections.

STD COL 14.4-1 The AP1000 plant test and operations (PT&O) organization is described in Subsection 14.2.2.1. The organization for operating and maintaining the AP1000 plant is described in Section 13.1.

Table 13.4-201 provides milestones for initial test program implementation.

14.2.2.1 PT&O Organization

The Initial Test Program (ITP) is the responsibility of the PT&O Organization. The ITP includes three phases of testing:

- Construction and Installation Testing
- Preoperational Testing
- Startup Testing

PTN COL 14.4-1

14.2.2.1.1 Testing Director

The Testing Director manages the ITP. During construction and preoperational testing, the Testing Director reports directly to the Project Director New Nuclear Projects. Beginning at initial fuel load, the Testing Director functionally reports to the Plant General Manager. The Testing Director is responsible for:

- Staffing the PT&O organization
- Developing, reviewing, and approving the administrative and technical procedures associated with the preoperational and startup phases

- Managing the ITP and personnel
- Implementing the ITP schedule
- Managing contracts associated with the ITP

14.2.2.1.2 PT&O Support Manager

The PT&O Support Manager reports directly to the Testing Director. The PT&O Support Manager plans and schedules procedure development to support startup. The PT&O Support Manager verifies that the test documents conform to the approved project procedures.

14.2.2.1.3 PT&O Engineers

The PT&O engineers report directly to the PT&O Support Manager.The PT&O engineers are responsible for developing preoperational and startup test procedures.

14.2.2.1.4 Startup Manager

The Startup Manager reports directly to the Testing Director and manages the preoperational and startup testing. The Startup Manager is responsible for:

- Participating in the Joint Test Working Group (JTWG) and ensuring that the JTWG reviews and approves administrative and test procedures. The JTWG structure and responsibilities are defined in the AP1000 Conduct of Test Program, Appendix A, “AP1000 Startup Site Administrative Manual - Program Management Description” (found in Reference 201)
- Preparing a detailed preoperational and startup testing schedule
- Coordinating construction turnover to the PT&O organization
- Informing the Testing Director when vendor support essential to preoperational and startup testing is required, and coordinating vendor participation
- Supervising and directing the startup engineers
- Involving operations personnel in testing activities by using operations personnel, to the extent practical, as test witnesses or test performers to provide the operations personnel with experience and knowledge

- Developing and implementing administrative controls to address system and equipment configuration control
- Maintaining the startup schedule
- Maintaining a daily startup log and issuing periodic progress reports that identify overall progress and potential challenges

14.2.2.1.5 Startup Engineers

The startup engineers report directly to the Startup Manager.

The startup engineers are responsible for:

- Complying with administrative controls
- Identifying any special or temporary equipment or services needed to support testing
- Coordinating testing with involved groups
- Performing preoperational and startup tests
- Reviewing and evaluating test results

STD COL 14.4-1 14.2.2.2 PT&O Organization Personnel Qualifications and Training

Personnel in the PT&O organization are qualified and trained in accordance with the “AP1000 Startup Site Administrative Manual - Program Management Description” (found in Reference 201).

14.2.3.2 Review of Test Results

Add the following text at the end of DCD Subsection 14.2.3.2:

STD COL 14.4-4 Upon completion of a test, the startup engineer is responsible for:

- Reviewing the test data.

- Evaluating the test results.
- Verifying that the acceptance criteria are met.
- Verifying that the test results that do not meet acceptance criteria are entered into the corrective action program.
- Verifying that the results of retesting do not invalidate ITAAC acceptance criteria.

Test results are reviewed and approved by the JTWG. Review and approval of test results are kept current such that succeeding tests are not dependent on systems or components that have not been adequately tested. Test exceptions which do not meet acceptance criteria are identified to the affected and responsible design organizations and entered into the corrective action program. Implementation of corrective actions and retests are performed as required.

PTN COL 14.4-4 Before initial fuel load, the results of the preoperational test phase are comprehensively reviewed by the PT&O organization and the JTWG to verify that the results indicate that the required plant structures, systems, and components are capable of supporting the initial fuel load and subsequent startup testing. The Project Director New Nuclear Projects approves fuel loading.

Each area of startup testing is reviewed and evaluated by the PT&O organization and the JTWG. The test results at each power ascension testing power plateau are reviewed and evaluated by the PT&O organization and the JTWG and approved by the Project Director New Nuclear Projectsbefore proceeding to the next plateau. Startup test reports are prepared in accordance with Regulatory Guide 1.16, “Reporting of Operating Information — Appendix A Technical Specifications.”

14.2.8 TEST PROGRAM SCHEDULE

Add the following text at the end of DCD Subsection 14.2.8:

STD SUP 14.2-1 A site-specific initial test program schedule will be provided to the NRC after issuance of the COL. This schedule will address each major phase of the test program (including tests that are required to be completed before fuel load), as

well as the organizational impact of any overlap of the first unit initial testing with the initial testing of the second unit.

14.2.9.4.15 Seismic Monitoring System Testing

Add the following text at the beginning of DCD Subsection 14.2.9.4.15:

STD COL 14.4-5 The seismic monitoring system testing described in this section of the DCD also applies to site-specific seismic sensors.

Add the following subsections after DCD Subsection 14.2.9.4.21:

STD COL 14.4-5 14.2.9.4.22 Storm Drains

Purpose

Storm drain system testing verifies that the drains prevent plant flooding by diverting storm water away from the plant, as described in Section 2.4.

Prerequisites

Construction of the storm drain system is completed, and the system is operational.

General Test Methods and Acceptance Criteria

The storm drain system is visually inspected to verify the flow path is unobstructed. The system is observed under simulated or actual precipitation events to verify that the runoff from roof drains and the plant site and adjacent areas does not result in unacceptable soil erosion adjacent to, or flooding of, Seismic Category I structures.

14.2.9.4.23 Off-Site AC Power Systems

Purpose

Off-site alternating current (ac) power system testing demonstrates the energization and proper operation of the as-installed switchyard components, as described in Section 8.2.

Prerequisites

Construction testing of plant off-site ac power systems, supporting systems, and components is completed. The components are operational and the switchyard equipment is ready to be energized. The required test instrumentation is properly calibrated and operational. The off-site grid connection is complete and available.

General Test Methods and Acceptance Criteria

The plant off-site ac power system components undergo a series of individual component and integrated system tests to verify that the off-site ac power system performs in accordance with the associated component design specifications. The individual component and integrated tests include:

a. Availability of ac and direct current (dc) power to the switchyard equipment is verified.

b. Operation of high voltage (HV) circuit breakers is verified.

c. Operation of HV disconnect switches and ground switches is verified.

d. Operation of substation transformers is verified.

e. Operation of current transformers, voltage transformers, and protective relays is verified.

f. Operation of switchyard equipment controls, metering, interlocks, and alarms that affect plant off-site ac power system performance is verified.

g. Design limits of switchyard voltages and stability are verified.

h. Under simulated fault conditions, proper function of alarms and protective relaying circuits is verified.

i. Operation of instrumentation and control alarms used to monitor switchyard equipment status.

j. Proper operation and load carrying capability of breakers, switchgear, transformers, and cables, and verification of these items by a non-testing means such as a QC nameplate check of as built equipment where testing would not be practical or feasible.

k. Verification of proper operation of the automatic transfer capability of the preferred power supply to the maintenance power supply through the reserve auxiliary transformer.

l. Switchyard interface agreement and protocols are verified.

The test results confirm that the off-site ac power systems meet the technical and operational requirements described in Section 8.2.

14.2.9.4.24 Raw Water System

Purpose

Raw water system testing verifies that the as-installed components supply raw water to the circulating water cooling tower basin, service water system cooling tower basin, fire protection water storage tanks, and other systems, as described in Subsection 9.2.11.

Prerequisites

Construction testing of the raw water system is completed. The components are operational and the storage tanks and cooling tower basins are able to accept water. Required support systems, electrical power supplies, and control circuits are operational.

General Test Methods and Acceptance Criteria

The raw water system component and integrated system performance is observed to verify that the system functions, as described in Subsection 9.2.11 and in appropriate design specifications. The individual component and integrated system tests include:

PTN COL 14.4-5

a. Operation of the system pumps and valves is verified.

b. Operation of the system instrumentation, controls, actuation signals, alarms, and interlocks is verified.

STD COL 14.4-5 14.2.9.4.25 Sanitary Drainage System

Purpose

Sanitary drainage system testing verifies that the as-installed components properly collect and discharge sanitary waste, as described in DCD Subsection 9.2.6.

Prerequisites

Construction testing of the sanitary drainage system is completed. Required support systems, electrical power supplies, and control circuits are operational.

General Test Methods and Acceptance Criteria

The sanitary drainage system component and integrated system performance is observed to verify that the system functions, as described in Subsection 9.2.6.2.1 and in appropriate design specifications. The individual component and integrated system tests include:

a. Operation of lift stations and valves is verified.

b. Operation of the system instrumentation, controls, actuation signals, and interlocks is verified.

14.2.9.4.26 Fire Brigade Support Equipment

Purpose

Fire brigade support equipment testing verifies that the equipment operates and is available when needed to perform the fire brigade functions, as described in Section 9.5.

Prerequisites

Equipment is ready and available for testing.

General Test Methods and Acceptance Criteria

The fire brigade support equipment undergoes a series of inspections to verify availability and operability. Equipment is available for selection and use, based on the hazard. Fire brigade support equipment tests include:

a. Location of portable extinguishers is verified; portable extinguishers are verified fully charged.

b. Operation of portable ventilation equipment is verified.

c. Operation of portable communication equipment is verified.

d. Operation of portable lighting is verified.

e. Operation of self-contained breathing apparatus and face masks is verified.

f. Operation of keys to open locked fire area doors is verified.

g. Turnout gear functionality and availability is verified.

h. Compatibility of threads for hydrants, hose couplings, and standpipe risers with the local fire department equipment is verified, or alternatively, an adequate supply of readily available hose thread adaptors is verified.

14.2.9.4.27 Portable Personnel Monitors and Radiation Survey Instruments

Purpose

Portable personnel monitors and radiation survey instruments testing verifies that the devices operate in accordance with their intended function in support of the radiation protection program, as described in Chapter 12.

Prerequisites

Portable personnel monitors, radiation survey instruments, and appropriate certified test sources are on site.

General Test Method and Acceptance Criteria

The portable personnel monitors and radiation survey instruments are source checked, tested, maintained, and calibrated in accordance with the manufacturers' recommendations. The portable monitor and instrument tests include:

a. Proper function of the monitors and instruments to respond to radiation is verified, as required.

b. Proper operation of instrumentation controls, battery, and alarms, if applicable.

Add the following subsection after DCD Subsection 14.2.10.4.28:

STD COL 14.4-5

14.2.10.4.29 Cooling Tower(s)

Objectives

- Verify proper cooling tower(s) function. Provide thermal acceptance testing of the cooling tower's heat removal capabilities.

Prerequisites

- The cooling tower(s) is structurally complete and in good operating condition.
- Circulating water system testing is complete.
- Required support systems, electrical power supplies, and control circuits are operational.

Test Method

Thermal performance of the cooling towers is tested and verified using established industry test standards.

Performance Criteria

The cooling tower(s) perform as described in Subsection 10.4.5 and in appropriate design specifications.

Add the following subsection after DCD Subsection 14.2.10:

14.2.11 REFERENCES

201. WEC (Westinghouse Electric Company), AP1000 Conduct of Test Program, Document Number APP-GW-GLR-038, Revision 2, June 2008.

14.3 CERTIFIED DESIGN MATERIAL

This section of the referenced DCD is incorporated by reference with the following departures and/or supplements.

Add the following subsections after DCD Subsection 14.3.2.2.

STD SUP 14.3-1

14.3.2.3 Site-Specific ITAAC (SS-ITAAC)

A table of inspections, tests, analyses, and acceptance criteria (ITAAC) entries is provided for each site-specific system described in this FSAR that meets the selection criteria, and that is not included in the certified design. The intent of these ITAAC is to define activities that are undertaken to verify the as-built system conforms with the design features and characteristics defined in the system design description. ITAAC are provided in tables with the following three-column format:

Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria

Each design commitment in the left-hand column of the ITAAC tables has associated inspections, tests, or analyses (ITA) requirements specified in the middle column. The acceptance criteria for the ITA are defined in the right-hand column.

SS-ITAAC do not address ancillary buildings and structures on the site, such as administrative buildings, parking lots, warehouses, training facilities, etc.

Selection Criteria — The following are considered when determining what information is included in the SS-ITAAC:

- In determining those structures, systems, or components for which ITAAC must be prepared, the following questions are considered for each structure, system, or component:
  - — Are any features or functions classified as Class A, B, or C?
  - — Are any defense-in-depth features or functions provided?
  - — For nonsafety-related systems, are any features or functions credited for mitigation of design basis events?

— For nonsafety-related systems, are there any features or functions that have been identified in DCD Section 16.3 as candidates for additional regulatory oversight?

If the answer to any of the above questions is yes, then ITAAC are prepared.

- The scope and content of the ITAAC correspond to the scope and content of the site-specific system design description.
- One inspection, test, or analysis may verify one or more provisions in the system design description. An ITAAC that specifies a system functional test or an inspection may verify a number of provisions in the system design description. There is not necessarily a one-to-one correspondence between the ITAAC and the system design descriptions.
- As required by 10 CFR 52.103, the inspections, tests, and analyses are completed (and the acceptance criteria satisfied) prior to initial fuel loading.
- The ITAAC verify the as-built configuration and performance characteristics of structures, systems, and components as identified in the system design descriptions.

Selection Methodology — Using the selection criteria, ITAAC table entries are developed for each selected system. This is achieved by evaluating the design features and performance characteristics defined in the system design descriptions and preparing an ITAAC table entry for each design description criterion that satisfies the selection criteria. A close correlation exists between the left-hand column of the ITAAC and the corresponding design description entries.

The ITAAC table is completed by selecting the method to be used for verification (either a test, an inspection, or an analysis) and the acceptance criteria for the as-built feature.

The approach used to perform the tests, inspections, or analyses is similar to that described in DCD Subsection 14.3.2.2.

14.3.2.3.1 Emergency Planning ITAAC (EP-ITAAC)

EP-ITAAC have been developed to address implementation of elements of the Emergency Plan. Site-specific EP-ITAAC are based on the generic ITAAC provided in Appendix C.II.1-B of Regulatory Guide 1.206. These ITAAC have

been tailored to the specific reactor design and emergency planning program requirements.

14.3.2.3.2 Physical Security ITAAC (PS-ITAAC)

Generic PS-ITAAC have been developed in a coordinated effort between the NRC and the Nuclear Energy Institute (NEI) as outlined in Appendix C.II.I-C of Regulatory Guide 1.206. These generic ITAAC have been tailored to the AP1000 design and site-specific security requirements.

14.3.2.3.3 Other Site-Specific Systems

No additional site-specific systems meet the ITAAC selection criteria. Such systems are subject to the normal functional testing to verify that newly designed and installed systems, structures, or components perform as designed.

PTN SUP 14.3-2

A summary of the AP1000 structures, systems, or components considered for selection is given in Table 14.3-201. This table supplements DCD Table 14.3-1.

14.3.3 CDM SECTION 3.0, NON-SYSTEM BASED DESIGN DESCRIPTIONS AND ITAAC

Add the following new subsections after the first paragraph in DCD Subsection 14.3.3.

14.3.3.1 Subbasemat Concrete ITAAC

Subbasemat concrete ITAAC has been developed to address verification that the subbasemat concrete has a compressive strength of 250–2000 psi, corresponding to a shear wave velocity in the range of 3500–6500 feet per second.

Table 14.3-201
ITAAC Screening Summary

PTN SUP 14.3-2

Structure/ System Acronym	Structure/System Description	Selected for ITAAC
DRS	Storm Drain System	XX
MES	Meteorological and Environmental Monitoring System	XX
RWS	Raw Water System	XX
TVS	Closed Circuit TV System	XX
VPS	Pump House Building Ventilation System	NA
YFS	Yard Fire Water System	XX
ZBS	Transmission Switchyard and Offsite Power System	XX
ZRS	Offsite Retail Power System	NA

Legend:
XX = Site-specific system selected for ITAAC — title only, no entry for COLA
NA = System is not part of Turkey Point Units 6 & 7 design

14.4 COMBINED LICENSE APPLICANT RESPONSIBILITIES

This section of the referenced DCD is incorporated by reference with the following departures and/or supplements.

14.4.1 ORGANIZATION AND STAFFING

STD COL 14.4-1 This COL Item is addressed in Section 14.2.

14.4.2 TEST SPECIFICATIONS AND PROCEDURES

STD COL 14.4-2 Preoperational and startup procedures are provided for the NRC in accordance with the requirements of DCD Subsection 14.2.3.

A cross reference list is provided between ITAACs and test procedures and/or sections of test procedures.

14.4.3 CONDUCT OF TEST PROGRAM

STD COL 14.4-3 A site-specific startup administration manual (procedure), which contains the administration procedures and requirements that govern the activities associated with the plant initial test program, as identified in DCD Subsection 14.2.3 and as described in APP-GW-GLR-038 (DCD Reference 2), is provided.

14.4.4 REVIEW AND EVALUATION OF TEST RESULTS

STD COL 14.4-4 Review and evaluation of individual test results, as well as final review of overall test results and selected milestones or hold points is addressed in Subsection 14.2.3.2. Test exceptions or results that do not meet acceptance criteria are identified to the affected and responsible design organizations, and corrective actions and retests, as required, are performed.

14.4.5 INTERFACE REQUIREMENTS

STD COL 14.4-5 This COL Item is addressed in Subsections 14.2.9.4.15, 14.2.9.4.22 through 14.2.9.4.27, 14.2.10.4.29 and in the Physical Security Plan.

14.4.6 FIRST-PLANT-ONLY AND THREE-PLANT-ONLY TESTS

STD COL 14.4-6 First-plant-only and first-three-plant-only tests either are performed in accordance with DCD Section 14.2.5 or a justification is provided that the results of the first-plant-only and first-three-plant-only tests are applicable to a subsequent plant. If the tests are not performed, the justification is provided prior to preoperational testing.