Example D45 - Seismic Site Verification ITAAC Closure Notification

XX/YY/ZZZZ (Date)

To: NRC

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

Subject: Completion of ITAAC 2.2 02.05a.iii

The purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of {Site Name and Unit #(s)} Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2 02.05a.iii for verification that the report exists and concludes that the as-built components including anchorage are seismically bounded by the tested or analyzed conditions 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

Design Commitment:

The seismic Category I components identified in Table 2.2.2-1 can withstand seismic design basis loads without loss of safety function.

Inspections, Tests, Analyses:

iii) Inspection will be performed for the existence of a report verifying that the as-built components including anchorage are seismically bounded by the tested or analyzed conditions.

Acceptance Criteria:

iii) The report exists and concludes that the as-built components including anchorage are seismically bounded by the tested or analyzed conditions.

ITAAC Determination Basis

Multiple ITAAC are performed to demonstrate that the seismic Category I components identified in Table 2.2.2-1 (Attachment A) can withstand seismic design basis loads without loss of safety function. The subject ITAAC requires an inspection to be performed for the existence of a report verifying that the as-built components including anchorage are seismically bounded by the tested or analyzed conditions.

Seismic qualification of the components in DCD Table 2.2.2-1 was previously verified by bounding type tests, analyses, or a combination of type tests and analyses in accordance with ITAAC 2.2.02.05a.ii (Reference 3).

In accordance with procedure XYZ, (Reference 4) an inspection was conducted of the Passive Containment Cooling System to confirm the satisfactory installation of the seismically qualified components. An Equipment Qualification (EQ) As-built reconciliation was completed verifying the installed configuration of the components listed in Attachment A, including anchorage, is seismically bounded by the tested or analyzed conditions and IEEE Standard 344-1987 (Reference 6) and Regulatory Guide 1.100 Revision 2. The EQ As-Built Reconciliation documentation (Reference 5) is identified in Attachment A.

ITAAC-Related Construction Finding Review

In accordance with XXX-XXX-XXX (project specific procedure for ITAAC completion), {Licensee} performed a review of all ITAAC-related construction findings pertaining to the subject ITAAC and associated corrective actions. This review found that there are no relevant ITAAC-related construction findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.2 02.05a.iii (Reference 2) and available for NRC inspection.

ITAAC Completion Statement

Based on the above information, [Licensee] hereby notifies the NRC that ITAAC 2.2 02.05a.iii was performed for Plant/Unit XYZ, and that the prescribed acceptance criteria are met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

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 XXX at xxx-xxx-xxxx.

Sincerely,

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

References (available for NRC inspection)

1. NEI 08-01, Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52.
2. ITAAC 2.2 02.05a.iii Completion Package
3. Nuclear Power Plan ITAAC 2.2 02.05a.ii ITAAC Closure Letter
4. EQ Walkdown Inspection Procedure ABC
5. EQ As-Built Reconciliation Report(s) as identified in Attachment A
6. IEEE Std 344-1987, Recommended Practices for Seismic Qualification of Class 1E Equipment for Nuclear Power Generating Stations.

Attachment A

Partial Excerpt of AP1000 DCD Tier 1 Table 2.2.2-1

EQUIPMENT QUALIFICATION ITAAC COMPLIANCE TABLE

SYSTEM: PASSIVE CONTAINMENT COOLING SYSTEM

Equipment Name	Tag Number	Seismic Cat. I	EQDP Report Number	EQ As-Built Reconciliation Report Number
PCCWST	PCS-MT-01	Yes	EQDP CB20	PCS-CB20-XXX
Water Distribution Bucket	PCS-MT-03	Yes	EQDP MT05	PCS-MT05-XXX
Water Distribution Wiers	PCS-MT-04	Yes	EQDP MT05	PCS-MT05XXX
PCCWST Isolation Valve	PCS-PL-V001A	Yes	EQDP PV11	PCS-PV-XXX
PCCWST Isolation Valve	PCS-PL-V001B	Yes	EQDP PV11	PCS-PV-XXX
PCCWST Isolation Valve	PCS-PL-V001C	Yes	EQDP PV01	PCS-PV-XXX
PCCWST Isolation Block MOV	PCS-PL-V002A	Yes	EQDP PV01	PCS-PV-XXX
PCCWST Isolation Block MOV	PCS-PL-V002B	Yes	EQDP PV01	PCS-PV-XXX
PCCWST Isolation Block MOV	PCS-PL-V002C	Yes	EQDP PV01	PCS-PV-XXX
PCS Recirculation Return Isolation Valve	PCS-PL-V023	Yes	EQDP PV10	PCS-PV-XXX
PCCWST Supply to Fire Protection System Isolation Valve	PCS-PL-V005	Yes	EQDP PV03	PCS-PV-XXX
PCS Makeup to SFS Isolation Valve	PCS-PL-V009	Yes	EQDP PV03	PCS-PV-XXX
Water Makeup Isolation Valve	PCS-PL-V044	Yes	EQDP PV03	PCS-PV-XXX
Water Bucket Makeup Line Drain Valve	PCS-PL-V015	Yes	EQDP PV02	PCS-PV-XXX
Water Bucket Makeup Line Isolation Valve	PCS-PL-V020	Yes	EQDP PV03	PCS-PV-XXX
PCCWST Long-Term Makeup Line Check Valve	PCS-PL-V039	Yes	EQDP PV03	PCS-PV-XXX
PCCWST Long-Term Makeup Drain Isolation	PCS-PL-V042	Yes	EQDP PV02	PCS-PV-XXX
PCS Discharge to SFS Pool Isolation Valve	PCS-PL-V045	Yes	EQDP PV02	PCS-PV-XXX
Recirc Header Discharge to PCCWST Isolation Valve	PCS-PL-V046	Yes	EQDP PV03	PCS-PV-XXX
PCCWST Drain Isolation Valve	PCS-PL-V049	Yes	EQDP PV02	PCS-PV-XXX
Recirc Header Discharge to SFS Pool Isolation Valve	PCS-PL-V050	Yes	EQDP PV02	PCS-PV-XXX
PCCWST Discharge to SFS Pool Isolation Valve	PCS-PL-V051	Yes	EQDP PV02	PCS-PV-XXX
PCS Water Delivery Flow Sensor	PCS-001	Yes	EQDP C1E	PCS-JE-XXX
PCS Water Delivery Flow Sensor	PCS-002	Yes	EQDP C1E	PCS-JE-XXX
PCS Water Delivery Flow Sensor	PCS-003	Yes	EQDP C1E	PCS-JE-XXX
PCS Water Delivery Flow Sensor	PCS-004	Yes	EQDP C1E	PCS-JE-XXX
Containment Pressure Sensor	PCS-005	Yes	EQDP C1E	PCS-JE-XXX

Equipment Name	Tag Number	Seismic Cat. I	EQDP Report Number	EQ As-Built Reconciliation Report Number
Containment Pressure Sensor	PCS-006	Yes	EQDP C1E	PCS-JE-XXX
Containment Pressure Sensor	PCS-007	Yes	EQDP C1E	PCS-JE-XXX
Containment Pressure Sensor	PCS-008	Yes	EQDP C1E	PCS-JE-XXX
PCCWST Water Level Sensor	PCS-010	Yes	EQDP C1E	PCS-JE-XXX
PCCWST Water Level Sensor	PCS-011	Yes	EQDP C1E	PCS-JE-XXX
High-range Containment Pressure Sensor	PCS-012	Yes	EQDP C1E	PCS-JE-XXX
High-range Containment Pressure Sensor	PCS-013	Yes	EQDP C1E	PCS-JE-XXX
High-range Containment Pressure Sensor	PCS-014	Yes	EQDP C1E	PCS-JE-XXX