

## Revised Example D29 - ASME Code Section III Components ITAAC Closure Notification

XX/YY/ZZZZ (Date)

To: NRC

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

Subject: Completion of ITAAC 2.3 06.02a

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 2.3 06.02a for verification that the American Society of Mechanical Engineers (ASME) Boiler & Pressure Vessel Code (BPVC) Section III design reports exist for the as-built components identified in Table 2.3.6-1 of the Design Control Document (DCD) as ASME Code Section III for the Normal Residual Heat Removal System (RNS), 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 components identified in Table 2.3.6-1 as ASME Code Section III are designed and constructed in accordance with ASME Code Section III requirements.*

#### Inspections, Tests, Analyses:

*Inspection will be conducted of the as-built components as documented in the ASME design reports.*

#### Acceptance Criteria:

*The ASME Code Section III design reports exist for the as-built components identified in Table 2.3.6-1 as ASME Code Section III.*

### **ITAAC Determination Basis**

Inspections were performed in accordance with ASME BPVC (indicate Code Edition/Date) Section III to demonstrate that the as-built components identified in Table 2.3.6-1(Attachment A) as ASME Code Section III are designed and constructed in accordance with ASME Code Section III requirements.

October 28, 2011

Each component listed in Tier 1 Table 2.3.6-1 as ASME Code Section III was fabricated in accordance with the DCD and the ASME BPVC Section III requirements. The ASME Code Section III Design Reports for these components exist and document that the as-built components conform to the approved design details. The ASME Section III Design Report for each component is documented in the component's completed ASME Section III Code Data Report. The individual component ASME Section III Code Data Reports are documented on the ASME Section III N-5 Code Data Report(s) ABC for the applicable piping system (Reference 2).

All the as-built piping systems including the components listed in Tier 1 Table 2.3.6-1 as ASME Code Section III, have been subjected to a reconciliation process (Reference 3), which verifies that the as-built piping systems have been analyzed for applicable loads (e.g. stress reports) and for compliance with all design specification and Code provisions. Design reconciliation of the as-built systems, including installed components, validates that construction completion, including field changes and any nonconforming condition dispositions, is consistent with and bounded by the approved design. All applicable fabrication, installation and testing records, as well as, those for the related QA verification/ inspection activities, which confirm adequate construction in compliance with the ASME BPVC Section III and design provisions, are referenced in the N-5 data report and/or its sub-tier references.

The applicable ASME Section III N-5 Code Data Report(s), which include the Design Reports for all the components listed in Tier 1 Table 2.3.6-1 as ASME Code Section III, exist and conclude that these components have been designed and constructed (including their installation within the applicable as-built piping system) in accordance with the ASME BPVC (indicate Code Edition/Date), Section III requirements. The N-5 Code Data Reports for the piping systems containing the components listed in Tier 1 Table 2.3.6-1 are 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 2.3 06.02a (Reference 4) and available for NRC inspection.

### **ITAAC Completion Statement**

Based on the above information, [Licensee] hereby notifies the NRC that ITAAC 2.3 06.02a 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.

October 28, 2011

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. ASME Section III N-5 Code Data Report(s) ABC for piping system(s)
3. Licensee's Program for As-Built Reconciliation of the ASME Piping Systems
4. ITAAC 2.3 06.02a Completion Package

October 28, 2011

## Attachment A

### Piping Identified as ASME Section III in AP1000 DCD Tier 1 Table 2.3.6-1 SYSTEM: NORMAL RESIDUAL HEAT REMOVAL SYSTEM

Equipment Name	Tag ID	N-5 (System Name) (1)
RNS Pump A (Pressure Boundary)	RNS-MP-01A	RNS-XXX
RNS Pump B (Pressure Boundary)	RNS-MP-01B	RNS-XXX
RNS Heat Exchanger A (Tube Side)	RNS-ME-01A	RNS-XXX
RNS Heat Exchanger B (Tube Side)	RNS-ME-01B	RNS-XXX
RCS Inner Hot Leg Suction Motor-operated Isolation Valve	RNS-PL-V001A	RNS-XXX
RCS Inner Hot Leg Suction Motor-operated Isolation Valve	RNS-PL-V001B	RNS-XXX
RCS Outer Hot Leg Suction Motor-operated Isolation Valve	RNS-PL-V002A	RNS-XXX
RCS Outer Hot Leg Suction Motor-operated Isolation Valve	RNS-PL-V002B	RNS-XXX
RCS Pressure Boundary Thermal Relief Check Valve	RNS-PL-V003A	RNS-XXX
RCS Pressure Boundary Thermal Relief Check Valve	RNS-PL-V003B	RNS-XXX
RNS Discharge Motor-operated Containment Isolation Valve	RNS-PL-V011	RNS-XXX
RNS Discharge Containment Isolation Test Connection	RNS-PL-V012	RNS-XXX
RNS Discharge Header Containment Isolation Check Valve	RNS-PL-V013	RNS-XXX
RNS Discharge RCS Pressure Boundary Check Valve	RNS-PL-V015A	RNS-XXX
RNS Discharge RCS Pressure Boundary Check Valve	RNS-PL-V015B	RNS-XXX
RNS Discharge RCS Pressure	RNS-PL-V017A	RNS-XXX

October 28, 2011

<b>Equipment Name</b>	<b>Tag ID</b>	<b>N-5 (System Name) (1)</b>
Boundary Check Valve		
RNS Discharge RCS Pressure Boundary Check Valve	RNS-PL-V017B	RNS-XXX
RNS Hot Leg Suction Pressure Relief Valve	RNS-PL-V021	RNS-XXX
RNS Suction Header Motor-operated Containment Isolation Valve	RNS-PL-V022	RNS-XXX
RNS Suction from IRWST Motor-operated Isolation Valve	RNS-PL-V023	RNS-XXX
RNS Discharge to IRWST Motor-operated Isolation Valve	RNS-PL-V024	RNS-XXX
RNS Discharge Header Relief Valve	RNS-PL-V045	RNS-XXX
RNS Suction from Cask Loading Pit Motor-operated Isolation Valve	RNS-PL-V055	RNS-XXX
RNS Suction from Cask Loading Pit Check Valve	RNS-PL-V056	RNS-XXX
RNS Pump Miniflow Air-Operated Isolation Valve	RNS-PL-V057A	RNS-XXX
RNS Pump Miniflow Air-Operated Isolation Valve	RNS-PL-V057B	RNS-XXX
RNS Return from Chemical and Volume Control System (CVS) Containment Isolation Valve	RNS-PL-V061	RNS-XXX

(1) System Name as defined on the ASME Section III N-5 Code Data Report.