

## Revised Example D48 -- Squib Valve Installed Configuration

XX/YY/ZZZZ (Date)

To: NRC

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

Subject: Completion of ITAAC 2.1 02.12a.v

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 2.1 02.12a.v for the verification that a report exists and concludes that the as-built squib valves in the Reactor Coolant System are bounded by the tests or type tests 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 automatic depressurization valves identified in Table 2.1.2-1 perform an active safety-related function to change position as indicated in the table.*

#### Inspections, Tests, Analyses:

*v) Inspection will be performed for the existence of a report verifying that the as-built squib valves are bounded by the tests or type tests.*

#### Acceptance Criteria:

*v) A report exists and concludes that the as-built squib valves are bounded by the tests or type tests.*

### **ITAAC Determination Basis**

Multiple ITAAC are performed to demonstrate that the automatic depressurization valves identified in DCD Tier 1 Table 2.1.2-1 (Attachment A) perform an active safety-related function to change position as indicated in the table. The subject ITAAC requires inspection for the existence of a report verifying that the as-built squib valves are bounded by the tests or type tests.

The squib valves in DCD Table 2.1.2-1 were previously type tested and demonstrated the capability of the valve to operate under its design conditions, as documented in the Equipment Qualification Document Package(s) XXX (Reference 2) in accordance with ITAAC 2.1 02.12a.iv (Reference 3). Equipment qualification data packages identify the equipment mounting employed for the type testing and the specific conditions tested.

In accordance with procedure XYZ (Reference 4) an inspection was conducted of the Reactor Coolant System to confirm the satisfactory installation of the squib valves. The inspection included verification of equipment make/model/serial number, verification of as-designed equipment mounting, and verification of the as-designed mechanical and electrical connections.

The documentation of installed configuration of the squib valves includes photographs and/or sketches of equipment mounting and connection. The verification of installed component configuration is documented in the Equipment Qualification (EQ) as-built reconciliation.

Attachment A identifies the EQ As-Built Reconciliation Report (Reference 2) completed to verify that the installed configuration of the squib valves identified in DCD Table 2.1.2-1 is bounded by the type tests.

### **ITAAC Finding Review**

In accordance with XXX-XXX-XXX (project specific procedure for ITAAC completion), {Licensee} performed a review of all ITAAC findings pertaining to the subject ITAAC and associated corrective actions. This review found that there was no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.1 02.12a.v (Reference 5) and available for NRC review.

### **ITAAC Completion Statement**

Based on the above information, Licensee XX hereby notifies the NRC that ITAAC 2.1 02.12a.v 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. Equipment Qualification Document Package(s) XXX
3. ITAAC 2.1 02.12a.iv Closure Letter
4. Procedure XYZ – Performance of As-built Reconciliation
5. ITAAC 2.1 02.12a.v Completion Package

**Attachment A**

**EQUIPMENT QUALIFICATION ITAAC COMPLIANCE MATRIX FOR  
AUTOMATIC DEPRESSURIZATION SQUIB VALVES IN AP1000 DCD TIER 1 TABLE 2.1.2-1**

**SYSTEM: REACTOR COOLANT SYSTEM**

<b>Equipment Name</b>	<b>Tag Number</b>	<b>Active Function</b>	<b>Type of Qualification</b>	<b>EQDP Number</b>	<b>As-Built Reconciliation Report Number</b>
Fourth-stage ADS Squib Valve	RCS-PL-V004A	Transfer Open	Type Testing	EQDP PV70	RCS-PV-XXX
Fourth-stage ADS Squib Valve	RCS-PL-V004B	Transfer Open	Type Testing	EQDP PV70	RCS-PV-XXX
Fourth-stage ADS Squib Valve	RCS-PL-V004C	Transfer Open	Type Testing	EQDP PV70	RCS-PV-XXX
Fourth-stage ADS Squib Valve	RCS-PL-V004D	Transfer Open	Type Testing	EQDP PV70	RCS-PV-XXX