Westinghouse Electric Company

## ITAAC "Technical Bases"

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## Introduction and Purpose

#### **Introduction**

- Detailed ITAAC Planning has revealed several ITAAC where successful completion of the ITA may be achieved by different, technically acceptable means.
- Beneficial for all involved to address uncertainty early in the process

#### **PURPOSE**

- Recognize that certain ITAAC require additional focus to improve the predictability for ITAAC Completion
- Discuss options for a forum to address such items



## **Identification Process**

- As part of ITAAC planning for AP1000<sup>®</sup>, a performance plan is written outlining the technical basis for the ITAAC, the AP1000 Plan to complete it, and the documentation necessary to support completion.
- Each AP1000 performance plan meets the technical bases for the ITAAC. Goal is to communicate these bases and remove uncertainty for those with a high potential for interpretation.



#### **EXAMPLES**

\*Intended to demonstrate the need for further discussion, not resolve the individual examples



#### ITAAC Statement – 2.3.06.11a

| Design Commitment           | Inspections, Tests,<br>Analyses | Acceptance Criteria         |
|-----------------------------|---------------------------------|-----------------------------|
| 11.a) Controls exist in     | Stroke testing will be          | Controls in the MCR         |
| the MCR to cause those      | performed on the                | operate to cause those      |
| remotely operated valves    | remotely operated valves        | remotely operated valves    |
| identified in Table 2.3.6-1 | identified in Table 2.3.6-1     | identified in Table 2.3.6-1 |
| to perform active           | using the controls in the       | to perform active           |
| functions.                  | MCR.                            | functions.                  |



## ITAAC Interpretation – 2.3.06.11a

| Item for Interpretation   | AP1000 Interpretation   |
|---|---|
| There are multiple controls in the MCR capable of operating these valves:<br>•Which control (or controls) are used to operate the valves? | The Plant Control System (PLS) is the<br>system normally used for operating<br>these valves remotely, and the test<br>should be done from one PLS operator<br>work station.<br>The valves are also subject to Plant<br>Safety and Monitoring System (PMS)<br>control, and that logic is tested<br>separately under ITAAC 11b. |



#### ITAAC Statement – 2.2.05.10

| Design Commitment   | Inspections, Tests,<br>Analyses   | Acceptance Criteria  |
|---|---|--|
| 10. After loss of motive<br>power, the remotely<br>operated valves identified<br>in Table 2.2.5-1 assume<br>the indicated loss of<br>motive power position. | Testing of the remotely<br>operated valves will be<br>performed under the<br>conditions of loss of<br>motive power. | After loss of motive<br>power, each remotely<br>operated valve identified<br>in Table 2.2.5-1 assumes<br>the indicated loss of<br>motive power position. |



# ITAAC Interpretation – 2.2.05.10

| Item for Interpretation   | AP1000 Interpretation   |
|---|---|
| <ul> <li>'Motive power' for air operated valves is compressed air. A loss of compressed air by isolation from CAS does not immediately result in a valve change of state.</li> <li>However, loss of power to the associated 3-way solenoid valve results in isolation of CAS to the valve and venting of the valve actuator.</li> </ul> | For air operated valves, testing will<br>include both removing the air supply<br>and venting the diaphragm (if<br>necessary) to fully remove the motive<br>power, and then observe the valve<br>position. |



### ITAAC Statement – 3.3.00.02a.ii.d

| Design Commitment   | Inspections, Tests,<br>Analyses   | Acceptance Criteria  |
|---|---|--|
| 2.a) The nuclear island<br>structures, including the<br>critical sections listed in<br>Table 3.3-7, are seismic<br>Category I and are<br>designed and constructed<br>to withstand design basis<br>loads as specified in the<br>Design Description,<br>without loss of structural<br>integrity and the safety-<br>related functions. | <ul><li>ii) An inspection of the as-built concrete thickness will be performed.</li></ul> | ii.d) A report exists that<br>concludes that the as-<br>built concrete thicknesses<br>of the radiologically<br>controlled area of the<br>auxiliary building sections<br>conform to the building<br>sections defined in Table<br>3.3-1. |



## ITAAC Interpretation – 3.3.00.02a.ii.d

| Item for Interpretation   | AP1000 Interpretation   |
|---|---|
| No objective standard is provided for<br>how frequently to measure each<br>building section.<br>One measurement per section may or<br>may not be sufficient, and infinite<br>measurement of the entire surface is<br>not practical. | An AP1000 Engineering Guideline,<br>(initially based on ACI 117-2010 and<br>augmented for the specifics of AP1000<br>design) provides minimum<br>measurement frequencies based on<br>section construction type. These<br>measurement points are sufficient to<br>determine the overall thickness of each<br>building section. |



### ITAAC Statement – 3.3.00.02a.ii.d

| Design Commitment   | Inspections, Tests,<br>Analyses   | Acceptance Criteria  |
|---|---|--|
| 2.a) The nuclear island<br>structures, including the<br>critical sections listed in<br>Table 3.3-7, are seismic<br>Category I and are<br>designed and constructed<br>to withstand design basis<br>loads as specified in the<br>Design Description,<br>without loss of structural<br>integrity and the safety-<br>related functions. | <ul><li>ii) An inspection of the as-built concrete thickness will be performed.</li></ul> | ii.d) A report exists that<br>concludes that the as-<br>built concrete thicknesses<br>of the radiologically<br>controlled area of the<br>auxiliary building sections<br>conform to the building<br>sections defined in Table<br>3.3-1. |



## ITAAC Interpretation – 3.3.00.02a.ii.d

| Item for Interpretation   | AP1000 Interpretation   |
|---|---|
| Table 3.3-1 Note 2: "These wall (and floor) thicknesses have a construction tolerance of $\pm$ 1 inch, except for exterior walls below grade where the tolerance is +12 inches, - 1 inch. | The Nuclear Island Basemat is neither<br>a wall nor a floor per ACI-349.<br>Therefore the tolerance in Note 2 does<br>not apply.<br>Since no stated tolerance exists in the<br>ITAAC statement, the Basemat ITAAC<br>tolerance is as-stated on the detailed<br>design drawings, consistent with other<br>portions of the Licensing Basis (i.e.<br>design of critical sections). |



## Next Steps

- Discuss the most appropriate forum for discussing these and other similar ITAAC
- Potential Options:
  - Planned meetings with Resident and Region II inspectors to review AP1000 Performance Plans for upcoming targeted ITAAC Inspections
  - Category 2 Public meetings with NRO and Region II
  - Other



### Back-up Slide: ITAAC Table 3.3-1 Excerpt

| Table 3.3-1<br>Definition of Wall Thicknesses for Nuclear Island Buildings, Turbine Building, and Annex Building <sup>(1)</sup> |                                      |                                       |   |  |
|---|--------------------------------------|---------------------------------------|---|--|
| Wall or Section Description   | Column Lines                         | Floor Elevation or<br>Elevation Range | Concrete<br>Thickness <sup>(2)(3)(4)(5)</sup> | Applicable Radiation<br>Shielding Wall<br>(Yes/No) |
| <b>Containment Building Internal Structure</b>  |                                      |                                       |   |  |
| Shield Wall between Reactor Vessel Cavity and RCDT Room   | E-W wall parallel with column line 7 | From 71'-6" to 83'-0"                 | 3'-0"   | Yes  |
| West Reactor Vessel Cavity Wall   | N-S wall parallel with column line N | From 83'-0" to 98'-0"                 | 7'-6"   | Yes  |
| North Reactor Vessel Cavity Wall  | E-W wall parallel with column line 7 | From 83'-0" to 98'-0"                 | 9'-0"   | Yes  |
| East Reactor Vessel Cavity Wall   | N-S wall parallel with column line N | From 83'-0" to 98'-0"                 | 7'-6"   | Yes  |
| West Refueling Cavity Wall  | N-S wall parallel with column line N | From 98'-0" to 135'-3"                | 4'-0"   | Yes  |
| North Refueling Cavity Wall   | E-W wall parallel with column line 7 | From 98'-0" to 135'-3"                | 4'-0"   | Yes  |
| East Refueling Cavity Wall  | N-S wall parallel with column line N | From 98'-0" to 135'-3"                | 4'-0"   | Yes  |
| South Refueling Cavity Wall   | E-W wall parallel with column line 7 | From 98'-0" to 135'-3"                | 4'-0"   | Yes  |
| South wall of west steam generator compartment  | Not Applicable                       | From 103'-0" to 153'-0"               | 2'-6"   | Yes  |
| West wall of west steam generator compartment   | Not Applicable                       | From 103'-0" to 153'-0"               | 2'-6"   | Yes  |
| North wall of west steam generator compartment  | Not Applicable                       | From 103'-0" to 153'-0"               | 2'-6"   | Yes  |
| South wall of pressurizer compartment   | Not Applicable                       | From 103'-0" to 153'-6"               | 2'-6"   | Yes  |
| West wall of pressurizer compartment  | Not Applicable                       | From 107'-2" to 160'-0"               | 2'-6"   | Yes  |
| North wall of pressurizer compartment   | Not Applicable                       | From 107'-2" to 160'-0"               | 2'-6"   | Yes  |
| East wall of pressurizer compartment  | Not Applicable                       | From 118'-6" to 160'-0"               | 2'-6"   | Yes  |
| North-east wall of in-containment refueling water storage tank  | Parallel to column line N            | From 103'-0" to 135'-3"               | 2'-6"   | No   |
| West wall of in-containment refueling water storage tank  | Not applicable                       | From 103'-0" to 135'-3"               | 5/8" steel plate with<br>stiffeners           | No   |
| South wall of east steam generator compartment  | Not Applicable                       | From 87'-6" to 153'-0"                | 2'-6"   | Yes  |

The column lines and floor elevations are identified and included on Figures 2.2-1 through 2.2-12.

These wall (and floor) thicknesses have a construction tolerance of + 1 inch, except for exterior walls below grade where the tolerance is +12 inches, -1 inch.

3. For walls that are part of structural modules, the concrete thickness also includes the steel face pl

4. For floors with steel surface plates, the concrete thickness also includes the plate thickness.

5. Where a wall (or a floor) has openings, the concrete thickness does not apply at the opening.

6. The elevation ranges for the shield building items are rounded to the nearest inch.

