



Alfred M. Paglia
Manager
Nuclear Licensing
New Nuclear Deployment

April 28, 2014
NND-14-0143
10 CFR 52.99(c)(1)

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Subject: Virgil C. Summer Nuclear Station (VCSNS) Unit 3
Combined License No. NPF-94
Docket Number 52-028
Completion of ITAAC 2.4.02.03i

Attachments: References

The purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) in accordance with 10 CFR 52.99(c)(1) of the completion of Virgil C. Summer Nuclear Station (VCSNS) Unit 3 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.4.02.03.i for verifying that a system design review shows that the trip signals from the two turbine electrical overspeed protection trip systems are isolated from, and independent of, each other. The closure process for this ITAAC is based on the guidance described in NEI 08-01 (Reference 1), which was endorsed by the NRC in Regulatory Guide 1.215.

ITAAC Statement

Design Commitment:

3. The trip signals from the two turbine electrical overspeed protection trip systems are isolated from, and independent of, each other.

Inspections, Tests, Analyses:

i. The system design will be reviewed.

Acceptance Criteria:

i. The system design review shows that the trip signals of the two electrical overspeed protection trip systems are isolated from, and independent of, each other.

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ITAAC Determination Basis

Multiple ITAAC are performed to demonstrate that the trip signals from the two turbine electrical overspeed protection trip systems are isolated from, and independent of, each other. The subject ITAAC requires a system design review be performed to show that the trip signals from the two turbine electrical overspeed protection trip systems are isolated from and independent of, each other.

The system design for the Turbine Control and Protection System (TCPS) was reviewed in accordance with the site procedure for formal design reviews. The AP1000 Plant Control System/Data Display & Processing System Final Design Review Report (Reference 2) shows that each trip is initiated and maintained electrically in separate systems, is located physically in separate cabinets, and uses different hardware and software/firmware. These system design attributes eliminate common cause failures (CCFs) from rendering the trip functions inoperable. The system design review shows that the trip signals of the two electrical overspeed protection trip systems are isolated from, and independent of, each other.

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, SCE&G performed a review of all ITAAC findings pertaining to the subject ITAAC and associated corrective actions. This review found that there are no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.4.02.03.i (Reference 3) and available for NRC inspection.

ITAAC Completion Statement

Based on the above information, SCE&G hereby notifies the NRC that ITAAC 2.4.02.03.i was performed for VCSNS Unit 3 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(e)(1).

If there are any questions, please contact Ryder Thompson at (803) 941-9812.

Sincerely,

A handwritten signature in black ink, appearing to read "Alfred M. Paglia, Jr.", with a long horizontal flourish extending to the right.

Alfred M. Paglia, Jr.
Manager
Nuclear Licensing
New Nuclear Deployment

RCT/AP/jl

- c. Document Control Desk
Victor McCree – Region II Regional Administrator
Thomas R. Fredette - NRC
Rahsean Jackson - NRC
Denise McGovern - NRC
James Reece - NRC
Marion Cherry – Santee Cooper
Stephen A. Byrne – SCE&G
Jeffrey B. Archie – SCE&G
Ronald A. Jones – SCE&G
Alan Torres – SCE&G
Ryder Thompson – SCE&G
April Rice – SCE&G
Alvis J. Bynum – SCE&G
Julie G. Ezell – SCE&G
Margaret Felkel – SCE&G
Cynthia Lanier – SCE&G
Joel Hjelseth – Westinghouse
Daniel Churchman – Westinghouse
Christopher Levesque – Westinghouse
Brian McIntyre – Westinghouse
Brian J. Bedford – Westinghouse
Tom Geer – Westinghouse
Michael Frankle – Westinghouse
Kathryn M. Sutton – Morgan Lewis
Ken Hollenbach – CB&I Stone & Webster
Curtis Castell - CB&I Stone & Webster
Chuck Baucom - CB&I Stone & Webster
AJ Marciano - CB&I Stone & Webster
Al Paglia-SCE&G
VCSummer2&3ProjectMail@cbi.com
vcsummer2&3project@westinghouse.com
DCRM-EDMS@SCANA.COM

References (available for NRC inspection):

1. NEI 08-01, Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52.
2. APP-PLS-GGR-007, AP1000 Plant Control System/Data Display & Processing System (FDR-09-29) Final Design Review Report
3. ITAAC 2.4.02.03.i Completion Package