



April R. Rice  
Manager  
New Nuclear Licensing

November 13, 2015  
NND-15-0643  
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  
ITAAC Closure Notification for ITAAC 2.5.09.02 [Index No. 576]

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 2.5.09.02 for verifying that a report exists and concludes that the Seismic Monitoring System (SJS) time-history analyzer and recording system can record data at a sampling rate of at least 200 samples per second, that the pre-event recording time is adjustable from less than or equal to 1.2 seconds to greater than or equal to 15.0 seconds, and that the initiation value is adjustable from less than or equal to 0.002g to greater than or equal to 0.02g. The closure process for this ITAAC is based on the guidance described in NEI 08-01, Industry Guideline for the ITAAC Closure Process under 10 CFR Part 52 (Reference 1), which was endorsed by the NRC in Regulatory Guide 1.215.

### **ITAAC Statement**

#### **Design Commitment:**

2. *The SJS can compute CAV and the 5 percent of critical damping response spectrum for frequencies between 1 and 10 Hz.*

#### **Inspections, Tests, Analyses:**

*Type tests using simulated input signals, analyses, or a combination of type tests and analyses, of the SJS time-history analyzer and recording system will be performed.*

Acceptance Criteria:

*A report exists and concludes that the SJS time-history analyzer and recording system can record data at a sampling rate of at least 200 samples per second, that the pre-event recording time is adjustable from less than or equal to 1.2 seconds to greater than or equal to 15.0 seconds, and that the initiation value is adjustable from less than or equal to 0.002g to greater than or equal to 0.02g.*

**ITAAC Determination Basis**

Type tests and analyses were performed to demonstrate the SJS time-history analyzer and recording system can record data at a sampling rate of at least 200 samples per second, that the pre-event recording time is adjustable from less than or equal to 1.2 seconds to greater than or equal to 15.0 seconds, and the initiation value is adjustable from less than or equal to 0.002g to greater than or equal to 0.02g.

The SJS time-history analyzer and recording system parameters were verified by the vendor as part of Factory Acceptance Testing. As part of this testing, each parameter (sampling rate, pre-event recording time, initiation value) was adjusted, and a file was run for the appropriate spectrum. The test results were documented in the ITAAC requirements report (Reference 2) and demonstrated the following:

- Type testing was performed at a sampling rate of 200 samples per second, meeting the requirement of a recording system capability of at least 200 samples per second.
- Recorded spectrums from type tests demonstrate pre-event recording times of 1 second and at 30 seconds exceeding the requirement that the pre-event recording time is adjustable from less than or equal to 1.2 seconds to greater than or equal to 15.0 seconds.
- Analysis of the motion recorders demonstrate the minimum initiation value to be 0.00000381g and a maximum initiation value of 4.0g exceeding the requirement that the initiation value is adjustable from less than or equal to 0.002g to greater than or equal to 0.02g.

**ITAAC Finding Review**

In accordance with plant procedures for ITAAC completion, SCE&G performed a review of all 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 2.5.09.02 (Reference 3) and available for NRC inspection.

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**ITAAC Completion Statement**

Based on the above information, SCE&G hereby notifies the NRC that ITAAC 2.5.09.02 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 Nick Kellenberger at (803) 941-9834.

Sincerely,



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**References (available for NRC inspection):**

1. NEI 08-01, Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52
2. VS3-JS01-VQ-850005, Seismic Monitoring System ITAAC Requirements
3. ITAAC 2.5.09.02 Completion Package