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April 1, 2016  
NND-16-0104  
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 on Completion of ITAAC 2.1.02.08a.ii [Index  
No. 29]

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 2.1.02.08a.ii for verifying that a report exists and concludes that the safety valves set pressure is 2485 psig  $\pm$  25 psi. 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:**

*8.a) The pressurizer safety valves provide overpressure protection in accordance with Section III of the ASME Boiler and Pressure Vessel Code.*

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

*ii) Testing and analysis in accordance with ASME Code Section III will be performed to determine set pressure.*

#### **Acceptance Criteria:**

*ii) A report exists and concludes that the safety valves set pressure is 2485 psig  $\pm$  25 psi.*

### **ITAAC Determination Basis**

Multiple ITAAC are performed to demonstrate that the pressurizer safety valves provide overpressure protection in accordance with Section III of the ASME Boiler and Pressure Vessel Code, 1998 Edition with 2000 Addenda (Reference 2). This ITAAC performs testing and analysis to determine the set pressure is 2485 psig  $\pm$  25 psi.

In accordance with Section III of the ASME Boiler and Pressure Vessel Code, testing of the pressurizer safety valves (RCS-PL-V005A and RCS-PL-V005B) was performed. ASME Boiler and Pressure Vessel Code, Section III, NB-7400, "Set Pressures of Pressure Relief Devices," requires that at least one pressure relief device shall have a set pressure not greater than any of the components within the system, and NB-7512.2, "Safety Valve Operating Requirements - Set Pressure Tolerance," requires a maximum of 1% set pressure tolerance for pressures over 1000 psig. Three lift check tests were performed by the manufacturer for each pressurizer safety valve and the values were recorded on a valve test report which is included in the quality data package for the valves.

Pressurizer safety valve RCS-PL-V005A had three set pressure tests performed with the following results: 2476 psig, 2507 psig and 2487 psig. Pressurizer safety valve RCS-PL-V005B had three set pressure tests performed with the following results: 2488 psig, 2480 psig and 2485 psig. Analysis of these lift check test results confirms the safety valves meet the required set pressure acceptance criteria.

The report "Quality Release and Certificate of Conformance for PV62 Pressurizer Safety Valves" (Reference 3) exists and contains valve test reports that conclude each safety valve's set pressure is 2485 psig  $\pm$  25 psi which meets the ITAAC acceptance criteria.

### **ITAAC Finding Review**

In accordance with plant procedures for ITAAC completion, the Licensee performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found one closed (1) notice of nonconformance (NON) associated with this ITAAC:

1. 99901431/2013-201-01.

The corrective actions for the finding have been completed and the finding is closed. This review is documented in the completion package for ITAAC 2.1.02.08a.ii (Reference 4), which is available for NRC review.

**ITAAC Completion Statement**

Based on the above information, SCE&G hereby notifies the NRC that ITAAC 2.1.02.08a.ii 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. ASME Boiler and Pressure Vessel Code, Section III, 1998 Edition with 2000 Addenda, Articles NB-7400 and NB-7512.2
3. VS3-PV62-VQQ-001, Quality Release and Certificate of Conformance for PV62 Pressurizer Safety Valves
4. ITAAC 2.1.02.08a.ii Completion Package