

December 8, 2016 NND-16-0538 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

Supplement for AP1000 ITAAC 2.6.01.02.ii [Index No. 580] Completion

Attachments: (1) References

The purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) in accordance with 10 CFR 52.99(c)(1) of supplemental information regarding the completion status of Virgil C. Summer Nuclear Station (VCSNS) Unit 3 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.6.01.02.ii for verification that a report exists and concludes that the seismic Category I components in the Main AC Power System can withstand seismic design basis loads without loss of safety function. This notification is being provided in accordance with NEI 08-01 (Reference 1), which was endorsed by the NRC in Regulatory Guide 1.215.

#### **Reason for Supplement**

Additional actions were required to maintain the completed status of ITAAC 2.6.01.02.ii following the submittal of ITAAC Closure Notification NND-16-0073 (ADAMs Accession Number ML16060A345) originally submitted on February 29, 2016, due to engineering changes to address compliance to IEEE 384-1981. The engineering changes incorporated new components into the RCP switchgear cabinet design which were not previously seismically qualified. Supplemental seismic testing and analysis was performed on the additional components to demonstrate the equipment can withstand seismic design basis loads without loss of safety function.

#### **ITAAC Statement**

#### **Design Commitment:**

2. The seismic Category I equipment identified in Table 2.6.1-1 can withstand seismic design basis loads without loss of safety function.

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### Inspections, Tests, Analyses:

ii) Type tests, analyses, or a combination of type tests and analyses of seismic Category I equipment will be performed.

### Acceptance Criteria:

ii) A report exists and concludes that the seismic Category I equipment can withstand seismic design basis loads without loss of safety function.

#### **Supplemental ITAAC Determination Basis**

After the original closure of ITAAC 2.6.01.02.ii, design changes were made to the Reactor Coolant Pump (RCP) switchgear cabinet to address compliance to IEEE 384-1981. The engineering changes incorporated new components into the RCP switchgear cabinet design which were not seismically qualified as part of the original RCP switchgear cabinet.

Seismic testing and analysis were performed on the additional components in accordance with the Updated Safety Analysis Report Appendix 3D, "Methodology for Qualifying AP1000 Safety-Related Electrical and Mechanical Equipment" (Reference 2) and IEEE Std 344-1987 (Reference 3). The results of the supplemental testing and analysis are documented in the Equipment Qualification Summary Report (Reference 4) and Equipment Qualification Data Package (Reference 5) for the RCP switchgear cabinet. These reports demonstrate the additional components in the RCP switchgear cabinet assembly can withstand seismic design basis loads without loss of safety function and therefore the acceptance criteria remains satisfied. The ITAAC Unit 3 2.6.01.02.ii Completion Package (Reference 6) has been updated to include this additional documentation. This maintains the completed status of ITAAC 2.6.01.02.ii.

# **ITAAC Finding Review**

There are no findings related to this ITAAC.

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## **ITAAC Completion Maintained Statement**

Based on the above information, SCE&G hereby notifies the NRC that the completed status of ITAAC 2.6.01.02.ii for VCSNS Unit 3 has been maintained, and that the prescribed acceptance criteria continue to be met.

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

Sincerely,

Ronald A Jones

V. P. Construction and Startup

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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. V.C. Summer Nuclear Station Unit 2 and 3 Updated Safety Analysis Report, Appendix 3D
- 3. IEEE 344-1987, Recommended Practices for Seismic Qualification of Class 1E Equipment for Nuclear Power Generating Stations
- 4. APP-ES02-VBR-001, Equipment Qualification Summary Report for the RCP Switchgear for Use in the AP1000 Plant
- 5. APP-ES02-VBR-003, Equipment Qualification Data Package for the RCP Switchgear for Use in the AP1000 Plant
- 6. Unit 3 ITAAC 2.6.01.02.ii Completion Package
- 7. NND-16-0073 (ADAMS Accession Number ML16060A345 Dated February 29<sup>th</sup>, 2016), Original Unit 3 ITAAC 2.6.01.02.ii Closure Notification