

Vogle PEmails

From: Hoellman, Jordan
Sent: Monday, December 12, 2016 10:21 AM
To: Vogle PEmails
Subject: SNC ITAAC Responses to NRC comments provided at 11/10/16 public meeting
Attachments: NRC call response-final.docx

SNC responses to NRC comments on Vogle Units 3 and 4 ICNs and UINs provided at November 10, 2016 public meeting.

Hearing Identifier: Vogtle_COL_Docs_Public
Email Number: 65

Mail Envelope Properties (e703fb95106a4488b3b450534ab60c4e)

Subject: SNC ITAAC Responses to NRC comments provided at 11/10/16 public meeting
Sent Date: 12/12/2016 10:21:00 AM
Received Date: 12/12/2016 10:21:03 AM
From: Hoellman, Jordan

Created By: Jordan.Hoellman2@nrc.gov

Recipients:
"Vogtle PEmails" <Vogtle.PEmails@nrc.gov>
Tracking Status: None

Post Office: HQPWMSMRS01.nrc.gov

Files	Size	Date & Time
MESSAGE	120	12/12/2016 10:21:03 AM
NRC call response-final.docx	17675	

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

UIN/ICN	Topic	ITAAC No.	Issue
UIN	Functional Arrangement	449,414,35 4,391,456, 458,68,252, 556,219,90, 554,573, 481,492, 503, 707, 592, 596, 621, 712, 284	<p>NRC comment: Tier 1 defines functional arrangement as “the physical arrangement of systems and components to provide the service for which the system is intended, and which is described in the system design description.” The IDB needs to reference the specific Tier 1 figures and tables as well as the detailed drawings used to perform the FA inspection. The conclusion statement must also tie back to the FA definition, i.e. the physical arrangement of the system and components provide the service for which the system is intended as described in ----.</p> <p>SNC shall withdraw (if not already withdrawn) and modify UIN’s based on comments above.</p>
UIN	Electrical equipment capacities	616	<p>The UIN should be clarified to indicate (1) whether load analysis requirements for the IDS dc electrical distribution system are actually described in VEGP 3&4 Updated Final Safety Analysis Report, Section 8.3.2, "DC Power Systems" (Reference 1), (2) whether the nameplate capacity ratings of the only the IDS fuses and circuit breakers are being verified as having nameplate capacities above their available loads or whether the buses of the dc distribution panels and MCCs are also included, and (3) what protective devices (fuses and breakers) and panels are enveloped by this UIN. Item 3 means that a reference should list the panels (dc distribution panels and MCCs) and fuses and breakers included in this ITAAC.</p> <p>SNC shall withdraw and modify UIN’s based on comments above.</p>
ICN	ASME HYDRO for Components	Vogtle 3 & 4 435,435	<p>NRC comment: The ICN lacks information needed to determine which ASME Code Section III sections were applied to verify this ITAAC. The definition of a test in Tier 1 is defined as the actuation, operation, or establishment of specified conditions to evaluate the performance or integrity of as-built structures, systems, or components unless explicitly stated otherwise. This ITAAC cannot be completed until the as-built system is completed and the N-5 data report has been compiled. The ICN report needs to reference the applicable ASME Code year & addenda, the section and Articles used that are applicable to the tests performed and include the N-5 data report and associated language. The ICN would be enhanced if the AC explicitly stated that no pressure boundary leakage was identified at test pressure xxxx psig.</p> <p>SNC does not intend to withdraw or modify these ITAAC Closure Notifications. The ASME N-5 report is not required for closing the ASME component ITAAC. The physical properties verified by</p>

			<p>this ITAAC are complete at the time of manufacture and testing at the vendor facility. NEI-08-01, section 9.4 describes how the testing prior to installation can be credited for ITAAC closure. The NEI example D-31 did not include wording about that no pressure boundary leakage was identified at test pressure xxxx psig. Based on NRO comment it is not clear which Hydrostatic test pressure would be referenced (component or piping system).</p> <p>NRC comment: Tier 2 chapter 3 section 3.9.3.2.2 requires a cold in-situ hydro test be performed to verify functional capability. This is in addition to the shell test of the valves which is also called out in this same section. Additionally, ASME Section III NC-6111 scope of pressure test states “All pressure retaining components, appurtenances, and completed systems shall be pressure tested. NC-6114.2</p> <p>SNC does not intend to withdraw or modify these ITAAC Closure Notifications. Tier 2 chapter 3 section 3.9.3.2.2 also references hot functional testing, preservice inspections and periodic inservice inspections. Based on NRO comments, would these tests be required prior to submitting the referenced ASME component ITAAC? ASME code NC-6114.2 is a class II component, subject components are class III. The correct code is ND-6114. ND-6114.2 refers to the “system test”, this is covered under a separate ITAAC for piping. The code also requires valves be pressure tested prior to installation in accordance with NC-3500. ND-3531.1 and ND-3531.2 are applicable to class III components. These codes required a shell hydrostatic test, and a valve closure test. These tests were performed and documented at the manufacturer’s facility.</p>
ICN	ASME components design and constructed iaw ASME sect.III	Vogtle 3 & 4 392, 392, 678,678, 431, 431	<p>NRC comment: This ITAAC cannot be completed until the as-built system is completed and the N-5 data report has been compiled. The ICN report needs to reference the applicable ASME Code year & addenda, the section and Articles used that are applicable and include the N-5 data report and associated language.</p> <p>SNC does not intend to withdraw or modify the referenced ICN’s. The N-5 is not required for closing the component ITAAC. The physical properties verified by this ITAAC are complete at the time of manufacture and testing at the vendor facility. NEI-08-01, section 9.4 describes how the testing prior to installation can be credited for ITAAC closure. SNC determined listing only the ASME Code Year and addenda would not be technically correct due to the code cases, or authorized alternates that may apply, thus the ICN referred to the UFSAR section discussing Codes and Code Cases. Additionally listing the UFSAR section provides the most</p>

			up-to-date ASME Code year, addenda, section, articles, and code cases and authorized alternatives that are applicable.
UIN	ASME HYDRO for ppg.	258	<p>NRC comment: The ICN report needs to reference the applicable ASME Code year & addenda, the section and Articles used that are applicable. The ICN would be enhanced if the AC explicitly stated that no pressure boundary leakage was identified at test pressure xxxx psig. Add words about ANI and being certified.</p> <p>SNC does not intend to withdraw or modify the UIN.</p> <ol style="list-style-type: none"> 1. The ITAAC Team determined that listing only the ASME Code Year and addenda would not be technically correct due to the code cases, or authorized alternatives that may apply Therefore, the UIN referred to the UFSAR section discussing Codes and Code Cases. Additionally listing the UFSAR section would also provide the most up-to-date ASME Code year, addenda, section, articles, and code cases and authorized alternatives that are applicable when the ICN is submitted. 2. The ITAAC Team determined that the ANI signs the Code Data report vice certify the Code Data Report. 3. The NEI example D-31 did not include wording about that no pressure boundary leakage was identified at test pressure xxxx psig.
UIN	ASME ppg design and constructed iaw ASME	254, 356, 286	<p>NRC comment: The ICN report needs to reference the applicable ASME Code year & addenda, the section and Articles used that are applicable.</p> <p>SNC does not intend to withdraw or modify the UIN. – Same comment as above regarding referencing the applicable code year and addenda.</p>
UIN	ASME ppg. NDE	256, 288, 358	<p>NRC comment: The ICN report needs to reference the applicable ASME Code year & addenda, the section and Articles used that are applicable.</p> <p>SNC does not intend to withdraw or modify the UIN.</p>
UIN	IIS As-Built Class 1E Cable Sheathing	570	<p>NRC Comment: UIN should include quality aspect of inspection results of sheathing (no cracking etc.)</p> <p>SNC does not intend to withdraw or modify the UIN. Tier 2 chapter 4 section 4.4.6.1 does not support comment as being required to complete ITAAC. UIN refers to appropriate quality inspection procedure to verify presence of sheaths.</p>