



April R. Rice
Manager
New Nuclear Licensing

January 19, 2017
NND-17-0014
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 2.5.02.07b [Index No. 535]

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 the completion of Virgil C. Summer Nuclear Station (VCSNS) Unit 3 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.5.02.07b for verifying that a report exists and concludes that the isolation devices prevent credible faults from propagating into the Protection and Safety Monitoring System (PMS) from the Data Display and Processing System (DDS). 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:

7.b) The PMS provides process signals to the DDS through isolation devices.

Inspections, Tests, Analyses:

Type tests, analyses, or a combination of type tests and analyses of the isolation devices will be performed.

Acceptance Criteria:

A report exists and concludes that the isolation devices prevent credible faults from propagating into the PMS.

ITAAC Determination Basis

Analysis was performed on the interfaces between the Protection and Safety Monitoring System (PMS) and the Data Display and Processing System (DDS) as described in the V.C. Summer Unit 2&3 Updated Final Safety Analysis Report (UFSAR) (Reference 2) to demonstrate that isolation devices prevent credible faults from propagating into the PMS.

Process signals from PMS to DDS are transmitted through a one-way fiber-optic cable. This one-way interface prevents communication faults from entering PMS from DDS. Electrical faults and surges are prevented by the use of fiber-optic communication media which provides electrical isolation. Due to the inherent properties of fiber-optic communication media, fault and surge testing are not necessary.

A further discussion on the fiber optic cables used as isolators between PMS and DDS can be found in AP1000 Protection and Safety Monitoring System Isolation Summary Report for Use in the AP1000 Plant (Reference 3) which concludes that the PMS/DDS isolation barriers will adequately isolate and protect the Class 1E PMS equipment from non-Class 1E disturbances.

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 2.5.02.07b (Reference 4) and available for NRC inspection.

ITAAC Completion Statement

Based on the above information, SCE&G hereby notifies the NRC that ITAAC 2.5.02.07b 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.

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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,



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New Nuclear Deployment

RT/AR/hz

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Attachment 1

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 Units 2&3 UFSAR, Section 7A
3. APP-PMS-VBR-015, AP1000 Protection and Safety Monitoring System Isolation Summary Report for Use in the AP1000 Plant
4. ITAAC 2.5.02.07b Completion Package