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January 30, 2017  
NND-17-0003  
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 2.2.02.06a.i [Index  
No. 131]

Attachments: (1) References  
(2) Equipment Qualification ITAAC Compliance Matrix for Harsh  
Environment Qualified Class 1E Equipment Listed in Table 2.2.2-1

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 2.2.02.06a.i for verifying a report exists and concludes the Class 1E equipment identified in Table 2.2.2-1 as being qualified for a harsh environment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of safety function for the time required to perform the safety function. 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:**

6.a) *The Class 1E components identified in Table 2.2.2-1 as being qualified for a harsh environment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of safety function for the time required to perform the safety function.*

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

i) *Type tests or a combination of type tests and analyses will be performed on Class 1E components located in a harsh environment.*

Acceptance Criteria:

- i) *A report exists and concludes that the Class 1E components identified in Table 2.2.2-1 as being qualified for a harsh environment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of safety function for the time required to perform the safety function.*

**ITAAC Determination Basis**

Multiple ITAAC are performed to demonstrate that the Class 1E equipment identified in the V.C. Summer Unit 3 Combined License (COL) Appendix C, Table 2.2.2-1 (Attachment 2) as being qualified for a harsh environment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of safety function for the time required to perform the safety function. The subject ITAAC requires type tests, analyses, or a combination of type tests and analyses to be performed on Class 1E equipment located in a harsh environment.

Equipment qualification reports for the Class 1E equipment identified in Table 2.2.2-1 as being qualified for a harsh environment conclude that the equipment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of safety function for the time required to perform the safety function.

For Class 1E electrical components, a combination of type testing and analysis was performed in accordance with IEEE 323- 1974 (Reference 2) and Regulatory Guide 1.89, "Qualification of Class 1E Equipment for Nuclear Power Plants," to meet the requirements of 10 CFR 50.49, "Environmental Qualification of Electrical Equipment Important to Safety for Nuclear Power Plants." Additional information about the methods used to qualify safety-related equipment supplied for the AP1000 is provided in the V.C. Summer Units 2&3 Updated Final Safety Analysis Report, Appendix 3D, "Methodology for Qualifying AP1000 Safety-Related Electrical and Mechanical Equipment" (Reference 3).

The Equipment Qualification Data Package (EQDP) and Equipment Qualification Summary Report (EQSR) (References 4 and 5, respectively), are identified in Attachment 2 for each Class 1E electrical component located in a harsh environment. These documents contain the applicable test reports, analyses, and associated documentation and conclude the equipment identified in V.C. Summer Unit 3 COL Appendix C, Table 2.2.2-1, can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of safety function for the time required to perform the safety function.

**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 2.2.02.06a.i (Reference 6) and available for NRC inspection.

**ITAAC Completion Statement**

Based on the above information, SCE&G hereby notifies the NRC that ITAAC 2.2.02.06a.i 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 Ryder Thompson at (803) 941-9812.

Sincerely,



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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. IEEE Std. 323-1974, "IEEE Standard for Qualifying Class 1E Equipment for Nuclear Power Generating Stations"
3. V.C. Summer Unit 2 and 3 Updated Final Safety Analysis Report, Appendix 3D, "Methodology for Qualifying AP1000 Safety-Related Electrical and Mechanical Equipment"
4. APP-JE52-VBR-006, "Equipment Qualification Data Package for NLI Differential Pressure Transmitters for Use in the AP1000 Plant"
5. APP-JE52-VBR-005, "Equipment Qualification Summary Report for NLI Differential Pressure Transmitters for Use in the AP1000 Plant"
6. ITAAC 2.2.02.06a.i Completion Package

**Attachment 2**

**EQUIPMENT QUALIFICATION ITAAC COMPLIANCE MATRIX FOR HARSH ENVIRONMENT QUALIFIED CLASS 1E  
EQUIPMENT LISTED IN TABLE 2.2.2-1**

**SYSTEM: PASSIVE CONTAINMENT COOLING SYSTEM**

<b>Equipment Name</b>	<b>Tag No.</b>	<b>Class 1E/Qual. for Harsh Envir.</b>	<b>EQDP Document Number</b>	<b>EQSR Document Number</b>
Containment Pressure Sensor	PCS-005	Yes/Yes	APP-JE52-VBR-006	APP-JE52-VBR-005
Containment Pressure Sensor	PCS-006	Yes/Yes	APP-JE52-VBR-006	APP-JE52-VBR-005
Containment Pressure Sensor	PCS-007	Yes/Yes	APP-JE52-VBR-006	APP-JE52-VBR-005
Containment Pressure Sensor	PCS-008	Yes/Yes	APP-JE52-VBR-006	APP-JE52-VBR-005
High-range Containment Pressure Sensor	PCS-012	Yes/Yes	APP-JE52-VBR-006	APP-JE52-VBR-005
High-range Containment Pressure Sensor	PCS-013	Yes/Yes	APP-JE52-VBR-006	APP-JE52-VBR-005
High-range Containment Pressure Sensor	PCS-014	Yes/Yes	APP-JE52-VBR-006	APP-JE52-VBR-005