



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
245 PEACHTREE CENTER AVENUE NE, SUITE 1200
ATLANTA, GEORGIA 30303-1257

March 21, 2017

Mr. Ronald A. Jones
Vice President, New Nuclear Operations
South Carolina Electric and Gas
P.O. Box 88 (Mail Code P40)
Jenkinsville, SC 29065-0088

SUBJECT: VIRGIL C. SUMMER NUCLEAR STATION UNIT 2 AND UNIT 3 - NRC
INSPECTION OF THE PREOPERATIONAL INITIAL TEST PROGRAM,
REPORTS 05200025/2017006, 05200026/2017006

Dear Mr. Jones:

On February 17, 2017, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Virgil C. Summer Nuclear Station Units 2 and 3. The enclosed inspection report documents the inspection results, which the inspectors discussed on February 17, 2017 with Mr. David Lavigne, General Manager of Organizational Development and Effectiveness, Virgil C. Summer Nuclear Station Units 2 and 3, and other members of your staff.

The inspection examined a sample of construction activities conducted under your Combined License (COL) as it relates to safety and compliance with the Commission's rules and regulations and with the conditions of these documents. These activities included a program review of the implementation of the Preoperational Initial Test Program as described in your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

Based on the results of this inspection, no findings were identified.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any), will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system ADAMS. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Should you have any questions concerning this letter, please contact us.

Sincerely,

/RA/

Michael Ernstes, Chief
Construction Inspection Branch 3
Division of Construction Oversight

Docket Nos.: 5200027, 5200028

License Nos: NPF-93, NPF-94

Enclosure: NRC Inspection Report (IR) 05200027/2017006, 05200028/2017006

w/attachment: Supplemental Information

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Letter to Ronald Jones from Michael Ernstes, dated March 21, 2017.

SUBJECT: VIRGIL C. SUMMER NUCLEAR STATION UNIT 2 AND UNIT 3 - NRC
INSPECTION OF THE PREOPERATIONAL INITIAL TEST PROGRAM,
REPORTS 05200025/2017006, 05200026/2017006

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OFFICIAL RECORD

**U.S. NUCLEAR REGULATORY COMMISSION
Region II**

Docket Numbers: 5200027
5200028

License Numbers: NPF-93
NPF-94

Report Numbers: 05200027/2017006
05200028/2017006

Licensee: South Carolina Electric & Gas

Facility: Virgil C. Summer Nuclear Station Units 2 and 3

Location: Jenkinsville, SC

Inspection Dates: January 25, 2017, through February 17, 2017

Inspectors: J. Baptist, Senior Construction Inspector, Construction
Inspection Branch (CIB) 3, Division of Construction Oversight,
(DCO), Region II (RII)
L. Castelli, Senior Construction Inspector, CIB 2, DCO, RII
C. Jones, Senior Construction Inspector, CIB 4, DCO, RII
J. Kent, Construction Inspector, CIB 4, DCO, RII
C. Taylor, Senior Construction Inspector, CIB 1, DCO, RII
J. Walker, Resident Inspector, CIB 3, DCO, RIII

Approved by: Michael Ernstes, Chief
CIB 3, DCO, RII

Enclosure

SUMMARY

Inspection Report (IR) 05200027/2017006, 05200028/2017006; 01/25/2017 through 02/17/2017; Virgil C. Summer Nuclear Station Unit 2 Combined License, Virgil C. Summer Nuclear Station Unit 3 Combined License, Nuclear Regulatory Commission (NRC) Inspection for Preoperational Initial Test Program (ITP).

This report covers an announced two-week team inspection of the Preoperational ITP procedures and implementation by regional and resident inspectors. The NRC's program for overseeing the construction of commercial nuclear power reactors is described in Inspection Manual Chapter 2506, "Construction Reactor Oversight Process General Guidance and Basis Document."

Preoperational Initial Test Program

Based on the review of the licensee's Preoperational ITP, the inspectors determined that the licensee had multiple components of a formally approved a Preoperational ITP administrative manual that provided a general description of the certain aspects of the preoperational test program and described the controls and measures for preoperational testing activities for V.C. Summer Units 2 and 3. In addition, the inspectors determined that the inspectable parts of the Preoperational ITP were consistent with the Updated Final Safety Analysis (UFSAR), Revision 4, the licensing basis, and applicable regulations. As not all of the Preoperational ITP administrative manual was complete, additional inspections are planned to finalize the requirements of Inspection Procedure (IP) 70367, "Inspection of Preoperational Test Program."

A. NRC-Identified and Self Revealed Findings

None

B. Licensee-Identified Violations

None

REPORT DETAILS

The NRC performed a Preoperational Initial Test Program (ITP) in-office inspection for the Virgil C. Summer Nuclear Station, Units 2 and 3, the week of January 25-27, 2017. An on-site inspection was performed the week of February 13, 2017. The Preoperational ITP inspection was performed in accordance with Inspection Manual Chapter (IMC) 2504, "Construction Inspection Program: Inspection of Construction and Operational Programs," dated October 24, 2012, and Inspection Procedure (IP) 70367, "Inspection of Preoperational Test Program," dated January 15, 2014.

This inspection was performed to verify that programmatically, the licensee had developed and implemented an approved Preoperational ITP administrative manual that described measures and controls that governed the preoperational test activities. In addition, this inspection verified that the licensee's Preoperational ITP was consistent with requirements and commitments described in the licensee's Updated Final Safety Analysis Report (UFSAR), Revision 4, the licensing basis, and applicable regulations.

1. CONSTRUCTION REACTOR SAFETY

Cornerstones: Design/Engineering, Procurement/Fabrication, Construction/Installation, Inspection/Testing

IMC 2504, Construction Inspection Program – Inspection of Construction and Operational Programs

1P01 Pre-operational Testing

The inspectors used the following NRC IP to perform this inspection:

- 70367 - Part 52, Inspection of Preoperational Test Program
- 70367-02.01 - Test Program
- 70367-02.02 - Test Organization
- 70367-02.03 - Test Program Administration
- 70367-02.04 - Document Control
- 70367-02.05 - Design Changes and Modifications
- 70367-02.08 - Test and Measurement Equipment

a. Inspection Scope

The V.C. Summer ITP Testing and Startup Director has the overall responsibility for conduct of the ITP. The ITP Organization is responsible for component testing, preoperational testing, and startup testing. South Carolina Electric & Gas (SCE&G) has delegated authority for technical direction and overall responsibilities to its contractor, WECTEC. SCE&G has retained overall responsibilities to conduct startup testing. Consequently, the inspection scope included a review of programs established by both the licensee and its contractor, WECTEC.

Test Program

The inspectors reviewed the ITP Administrative Manual to verify that testing guidance was identified and that responsibilities were assigned for the following general areas:

- hydrostatic tests of piping, vessels, and systems designed to contain pressurized or radioactive fluids;
- instrument calibration;
- functional demonstration of equipment in all modes throughout its operating range, including applicable flow tests; and
- electrical, mechanical, and instrument and control testing.

Additionally, the inspectors reviewed the V.C. Summer, Units 2 and 3, preoperational performance activities schedule to ensure that tests had been properly identified and sequenced. Specifically, individual preoperational test activities were reviewed to verify that the following attributes were identified and consistent with licensee commitments:

- scope of the test and test objectives;
- necessary prerequisites;
- test methods;
- related significant parameters & plant performance characteristics; and
- acceptance criteria.

The inspectors also reviewed procedures within the licensee's ITP Administrative Manual to ensure adequate format and content direction existed to satisfy NRC inspection procedure (IP) criteria contained within IP 70702, "Part 52, Inspection of Preoperational Test Performance." Specifically, the program review focused on verifying the following attributes were identified within the licensee's test procedure development documents:

- appropriate staff and management approval indicated on the document;
- test objectives clearly stated;
- required testing prerequisites identified;
- test acceptance criteria clearly identified and a required comparison of results with acceptance criteria;
- initial test conditions specified;
- a listing of references to appropriate preoperational test descriptions, inspections, tests, analyses and acceptance criteria (ITAAC), FSAR sections,

technical specifications, drawings, design specifications, industry codes, and other requirements;

- step-by-step instructions for the performance of the procedure, including hold points, if needed, included to the extent necessary to ensure that the test is performed correctly and the test objectives are met;
- blank spaces provided for initialing all items, including prerequisites, to document performance;
- provisions made for recording details of the conduct of the test, including any test anomalies or observed deficiencies, their resolution, and any necessary retesting;
- temporary connections, blind flanges, disconnections or jumpers be restored to normal at the end of the test, or reference their control by another procedure;
- identification of both personnel conducting the testing and those evaluating the test data. Provision is made for the evaluator to document acceptability of the data;
- procedure provides for quality control, quality assurance, engineering, or other specified individual verification of critical steps or test parameters;
- any special precautions for personnel and equipment safety are specified;
- expected performance of any automatic functions or controls is specified; and
- verification of calibration of measuring and test equipment (M&TE) and recording of any temporarily installed or used M&TE equipment identification and calibration date.

Test Organization

The inspectors conducted interviews with plant personnel and reviewed the Preoperational ITP administrative manual to verify whether the following attributes were identified and documented within the licensee's test program organization:

- formal method and responsibility for appointing key personnel in the test program are formally specified in writing;
- identification for the lines of authority and responsibilities of test personnel are formally specified in writing;
- identification for interfaces that exist between organizations involved in the test program and the organization's responsibilities are clearly established in writing;
- identification for the responsibilities, qualifications, and training of management and staff who develop preoperational test procedures and will conduct the preoperational tests are formally specified in writing.

The inspectors conducted interviews with plant personnel and reviewed the Preoperational ITP administrative manual to verify training guidance was developed for test engineers (supervisory and non-supervisory). Specifically, the inspectors reviewed the training department's organizational structure, staffing, training requirements for supervisory and non-supervisory test engineers, and implementing procedures that govern the training department. The inspectors reviewed test engineers training records (supervisory and non-supervisory), certifications, on the job evaluations, and the overall process for tracking and identification of training for test engineer personnel.

The inspectors conducted interviews with plant personnel and reviewed the Preoperational ITP administrative manual to verify if the licensee's Joint Test Working Group (JTWG) was established and formally approved. The UFSAR describes the JTWG responsibilities for overseeing the implementation of the ITP. The UFSAR also describes the JTWG as an organizational group that consists of authorized representative personnel from the plant's operations and support group functions, Westinghouse Electric Company (WEC), responsible design organizations, and other test support groups. Specifically, the Preoperational ITP administrative manual was reviewed to verify the following controls and organizational structure were identified within the licensee's JTWG implementing procedures:

- measures established to verify that personnel formulating and conducting test activities are not the same personnel who designed or are responsible for satisfactory performance of the system(s) or design features(s) being tested;
- identification of qualified representatives from the following test support organizations: Operations, Maintenance, Preoperational, Startup, Engineering and Design;
- descriptions of responsibilities for the following test support organizations: Operations, Maintenance, Preoperational, Startup, Engineering and Design;
- formal processes for review and approval of Preoperational ITP implementing procedures;
- formal processes for review and approval of component test procedures, as specified by the JTWG chairman;
- formal processes for review and approval of preoperational and startup test procedures;
- identification of responsible organizations and responsibilities for the implementation of component, preoperational, and startup testing, including planning, scheduling and performance activities; and
- formal processes for review and approval of component, preoperational and startup test results.

Test Program Administration

The inspectors conducted interviews and reviewed the Preoperational ITP administrative manual to verify the adequacy of administrative measures and the establishment of formal methods and measures for the following:

- control of system status before testing; and
- control of system status subsequent to testing, including measures necessary to prevent invalidation of test results.

The inspectors verified that formal administrative measures were established governing the conduct of testing including:

- methods for verifying a test procedure is current before its use;
- requirements for conducting pretest briefings, which should include discussion of the risk to personnel and equipment, possible malfunctions/failure modes including consequences and contingencies, Operating Experience applicable to the testing performed, and criteria to abort the test;

- methods to ensure personnel involved in the conduct of the test are knowledgeable of the test procedure;
- requirements for procedure use (procedure in hand or other acceptable method, performance of steps out of sequence allowance, procedure compliance, etc.);
- methods to change (both major and minor) a test procedure during the conduct of testing;
- criteria for termination or interruption of a test and continuation of an interrupted test;
- methods to coordinate the conduct of testing including test (shift) turnover requirements for continuity, communication methods to be used, and clear identification of the test director;
- methods to document significant events, unusual conditions, or interruptions to testing; and
- methods for identifying deficiencies, documenting their resolutions, and documenting retesting.

The inspectors reviewed administrative controls to verify formal methods for evaluation of test results were established and to ensure the program provided for the following:

- controls to confirm that approved test procedures are in a form suitable for review by NRC inspectors at least 60 days prior to their intended use, or at least 60 days prior to fuel loading for fuel loading and startup test procedures;
- controls to provide timely notification to the NRC of changes in approved test procedures previously available for NRC review;
- controls to establish a schedule to conduct the major phases of the initial test program, relative to the expected fuel loading date;
- controls to allow at least 9 months for conducting preoperational testing; and
- controls to allow at least 3 months for conducting startup testing, including fuel loading, low-power tests, and power-ascension tests.

Finally, the inspectors reviewed the V.C. Summer Units 2 & 3 Preoperational ITP administrative manual and associated procedures to verify that a formal program for evaluation of test results has been established. Specifically, the inspectors verified that the program established the following attributes and ensured their consistency with licensee commitments:

- test data is properly verified and compared to test results in a qualitative, quantitative, meaningful, and understandable form;
- test results are checked against design and compared with previously determined performance standards, limits, or acceptance criteria;
- deficiencies are clearly identified, documented, and appropriate corrective action has been proposed, reviewed, and completed;
- after corrective actions or modifications have been completed, tests or portions of a test have been rerun as necessary to ensure that tests on the as-built system are adequate and meet standards, limits or acceptance criteria; and
- test result evaluations were reviewed and formally approved by appropriate licensee personnel and/or contractor personnel, including the person(s) responsible for approving the original test procedures.

Document Control

The inspectors conducted interviews and reviewed Preoperational ITP administrative manual to verify administrative controls for test procedures, engineering drawings, and vendor manuals. Specifically, the inspectors verified that formal administrative measures were established for the following areas:

- controls for test procedure processes for review, approval, and issuance;
- controls for the revision of approved test procedures;
- revised test procedures are reviewed and approved by the same persons and/or groups as the original procedure;
- issuance of revisions and control of obsolete procedures;
- test procedure changes screened to determine if a change to UFSAR Section 14.2 is needed;
- operating procedures, surveillance procedures, etc., used during preoperational testing, received the same reviews and approvals required for preoperational test procedures; and
- assigned responsibilities to ensure implementation of procedure controls.

Design Changes and Modifications

The inspectors conducted interviews of plant personnel and reviewed the Preoperational ITP administrative manual to verify if program controls assured that proposed plant changes were reviewed for potential UFSAR impact, and controlled in accordance with the UFSAR, the licensing basis, and the requirements of 10 CFR 52.98 and 10 CFR Part 52, Appendix D. Specifically, the program review focused on those attributes that govern design changes associated with testing of essential plant components and systems under the ITP. The inspection scope specifically examined provisions for the following activities:

- controls for field changes;
- temporary modifications, lifted leads, and jumpers;
- dispositions of test deficiencies and nonconformances; and
- training of qualified reviewers.

Test and Measurement Equipment

The inspectors reviewed the Preoperational ITP administrative manual to verify if implementation documents were established for control of special test equipment and installed devices used in the Preoperational ITP. The devices of interest would be relied on to show an acceptance criterion has been met or to ensure significant limitations are not exceeded. The inspection scope specifically examined the following provisions:

- identification of controlled equipment;
- controls for storage and issuance;
- recording test equipment identity and calibration date;
- calibrations of installed instrumentation; and
- actions for devices found out of calibration.

The inspectors determined that existing Preoperational ITP administrative controls for component testing did not address calibration of installed process instrumentation that are used to obtain test data and to verify acceptance criteria. However, interviews with licensee personnel indicated component testing activities had not yet been implemented, and procedures to appropriately address requirements were under development.

b. Findings

No findings were identified.

4. OTHER INSPECTION RESULTS

4OA6 Meetings, Including Exit

.1 Exit Meeting

On February 17, 2017, the inspectors presented the inspection results to David Lavigne, General Manager of Organizational Development and Effectiveness, V.C. Summer 2&3, along with other licensee and contractor staff members. The inspectors stated that no proprietary information would be included in the inspection report.

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensees and Contractor Personnel

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K. Brown, (SCE&G) Licensing
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D. Hyde, (WEC) Preoperational Test Manager
M. Matoney, (SCE&G) Lead Process Analyst
T. Messersmith, (WEC) Testing and Startup Director
J. Pouliot, (WEC) Lead Test Engineer
R. Steffy, (SCE&G) Nuclear Plant Startup Manager

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

<u>Item Number</u>	<u>Type</u>	<u>Status</u>	<u>Description</u>
None			

LIST OF DOCUMENTS REVIEWED

Section 1P01

Procedures

VSG-GW-VTM-001, "Initial Test Program Administration and Organization", Rev. 1
VSG-GW-VTM-003, "Initial Test Program Test Engineer Qualification", Rev. 4
VSG-GW-VTM-004, "Conduct of Test", Rev. 2
VSG-GW-VTM-006, "Initial Test Program Troubleshooting", Rev.2
VSG-GW-VTM-007, "Initial Test Program Jurisdictional Control Tagging", Rev.0
VSG-GW-VTM-009, "Initial Test Program Control System Software Configuration Management Procedure", R.1
VSG-GW-VTM-010, "Initial Test Program Temporary Modifications", Rev. 2
VSG-GW-VTM-011, "Initial Test Program Administrative and Test Procedure Development", Rev. 4
VSG-GW-VTM-014, "Operating Experience", Rev.2
VSG-GW-VTM-015, "Initial Test Program Temporary Software CHanges", Rev.1
VSG-GW-VTM-016, "Initial Test Program Interface with Site Programs", Rev. 0
VSG-GW-VTM-019, "Joint Test Working Group", Rev.3
VSG-GW-VTM-021, "Initial Test Program Work Release", Rev.1
VSG-GW-VTM-022, "Initial Test Program Personnel Training", Rev.4
VSG-GW-VTM-023, "Initial Test Program Records", Rev.2
APP-GW-TSP-115, "AP1000 Test Requirements Matrix", Rev. 2
APP-GW-GZP-004, "Configuration Management Procedure for U.S. AP1000 Projects", Rev.3
NCSP03-10, "Measuring and Test Equipment (M&TE) Control", Rev. 04.03
W2-8.4-102, "Design Document Verification", Rev. 0.0
W2-6.1-100, "Document Control", Rev. 1.1

LIST OF ACRONYMS

ADAMS	Agency Wide Documents Access & Management System
CFR	Code of Federal Regulation
COL	Combined License
DCO	Division of Construction Oversight
IMC	Inspection Manual Chapter
IP	Inspection Procedure
IR	Inspection Report
ITAAC	Inspections, Tests, Analyses, and Acceptance Criteria
ITP	Initial Test Program
JTWG	Joint Testing Working Group
MT&E	Measuring Test & Equipment
NRC	Nuclear Regulatory Commission
PARS	Publically Available Records
QA	Quality Assurance
QC	Quality Control
SCE&G	South Carolina Electric and Gas
UFSAR	Updated Final Safety Analysis Report
WEC	Westinghouse Electric Company