

Vogle PEmails

From: Hoellman, Jordan
Sent: Tuesday, December 05, 2017 10:01 AM
To: Vogle PEmails
Subject: Emergency Planning ITAAC Comment Status Sheet
Attachments: 2017-11-16 EP ITAAC Comment Status Sheet.docx

Please see the attached Emergency Planning (EP) ITAAC Comment Status Sheet for discussion at the 12/7/2017 public meeting.

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ITEM #	ICN UIN	TOPIC	ITAAC INDEX	ISSUE	NRC response										
1	NA	Vogtle 4 Emergency Planning ITAAC	733, 849, 852, 853, 854, 855, and 856	<p>SNC asked the following question: The ICN for U3 853 (E.3.9.05.01.05) was submitted in March 2016 and has been verified as complete by the NRC. The Unit 4 COL is:</p> <table border="1" data-bbox="753 334 1589 509"> <thead> <tr> <th data-bbox="753 334 848 440">No.</th> <th data-bbox="848 334 982 440">ITAA C No.</th> <th data-bbox="982 334 1220 440">Program Commitment</th> <th data-bbox="1220 334 1400 440">Inspections, Tests, Analyses</th> <th data-bbox="1400 334 1589 440">Acceptance Criteria</th> </tr> </thead> <tbody> <tr> <td data-bbox="753 440 848 509">853</td> <td data-bbox="848 440 982 509"></td> <td data-bbox="982 440 1220 509">Verified on VEGP Unit 3</td> <td data-bbox="1220 440 1400 509"></td> <td data-bbox="1400 440 1589 509"></td> </tr> </tbody> </table> <p>The U3 ICN was submitted on the U3 docket, but included this paragraph on the Completion Statement “The Maintenance Support Building is a common structure applicable to both Vogtle Units 3 & 4. The VEGP Unit 4 COL Appendix C Index 853 Program Commitment states “Verified on VEGP Unit 3”. Therefore, since the Unit 3 ITAAC is verified, the Program Commitment for the VEGP Unit 4 COL Appendix C Index 853 is met.”</p> <p>The Unit 4 ITAAC Notifications Review Status Report on the NRC web site has the following for 853 U4: E.3.9.05.01.05 §52.99(c)(1) {ICN} 7/7/2016 ITAAC Deleted Deleted via License Amendment 24, ML14245A075</p> <p>I believe the intent was to delete the Unit 4 853 ITAAC in amendment 24, but it still is listed on the Unit 4 COL. We are getting ready to submit ICN 849 (E.3.9.05.01.01), which is the same situation (listed as “verified on VEGP Unit 3” on the Unit 4 COL).</p> <p>Questions: Is the “ITAAC Deleted” note in the Unit 4 ITAAC Notifications Review Status Report sufficient to “close” Unit 4 853 or are you expecting something more from us? How should we address Unit 4 849 as far as ICN submittal?</p>	No.	ITAA C No.	Program Commitment	Inspections, Tests, Analyses	Acceptance Criteria	853		Verified on VEGP Unit 3			<p>SNC submitted an ICN for Vogtle Unit 3 ITAAC index number 849 and has asked for clarification regarding what documentation they must submit with respect to ITAAC 853 and 849 for Unit 4.</p> <p>Appendix C of Vogtle Unit 4’s COL currently identifies 7 ITAAC as being “Verified on VEGP Unit 3”; they are 733, 849, 852, 853, 854, 855, and 856. For these ITAAC, the ITAAC Index number remains in Vogtle Unit 4’s COL but the ITAAC number, PC, ITA, and AC have been deleted. These ITAAC are in fact deleted for Unit 4. All that is required is an ICN for Unit 3, no ICN is required for Unit 4. You may, if desired for completeness, continue to add a remark similar in nature to the one provided in the ICN for 853. The additional remark is not required.</p>
No.	ITAA C No.	Program Commitment	Inspections, Tests, Analyses	Acceptance Criteria											
853		Verified on VEGP Unit 3													

ITEM #	ICN UIN	TOPIC	ITAAC INDEX #	ISSUE	NRC response
2	NA	Vogtle Unit 3 & 4 Emergency Planning ITAAC	849, 850, 851, 852, 853, 854, 855, 856, 857, 858	Vogtle Unit 3 COL EP ITAAC 849 to 858 are derived from the Vogtle ESP (ITAAC 849-855 and 857-858) and the COL application (ITAAC 856). In both the ESP and in the Vogtle COL FSER, there are multiple AC associated with a single program commitment (PC) and a single ITA. Table 13.3-1 of the Vogtle COL FSER grouped the AC for ITAAC 849 to 856 with a single PC and ITA. The FSER table also grouped the AC for ITAAC 857 and 858 with a single PC and ITA. However, when the Vogtle COL was issued, the ITAAC were grouped differently than they were in the Vogtle COL FSER or the Vogtle ESP. Instead of grouping multiple AC with a single PC and ITA, the PC and ITA were repeated for each AC, resulting in each ITAAC being independent, which resulted in the PC and ITA not always being fully aligned with each independent AC.	<p>The licensee provided the attached table and requested NRC clarification of ITAAC 849 to 858. The staff has considered the matter and provides the following response:</p> <p>A basic principle is that requirements should be interpreted in accordance with their plain meaning. Applying the plain meaning principle to EP ITAAC 849-858 as organized in the Vogtle Unit 3 COL would lead to the conclusion that the entirety of the prescribed ITA is required to close each AC. However, there is an exception to the plain meaning principle if the literal reading leads to an absurd result. The staff has determined that in some cases, requiring performance of the entirety of the ITA leads to an absurd result. For example, the ITA for ITAAC 849 requires an inspection and test of both the TSC and the OSC, but the AC is limited to verifying that the TSC has a floor space of at least 2,175 square feet. Since the AC is limited to the TSC, it would be absurd to require an ITA of the OSC. It would also be absurd to require a test to verify the AC for ITAAC 849 because the COL's definition of "inspection" explicitly includes "measurements of dimensions," while measuring floor space would not fit within the COL's definition of "test." On the other hand, several of the AC appear to allow, or even call for, both an inspection and test. If it is reasonable to perform both an inspection and test to verify the AC, then it would not be absurd to require an inspection and test.</p> <p>The staff notes in the attached Table provided by SNC, the wording provided for the PC and ITA is not consistent with the wording provided in the combined license for ITAAC 857 and 858. The staff also notes that SNC has proposed deleting ITAAC index numbers 850 and 857 in its license amendment request 17-0014, which is currently under review by the staff.</p>

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2	NA	Vogtle Unit 3 & 4 Emergency Planning ITAAC	849, 850, 851, 852, 853, 854, 855, 856, 857, 858		<p>Based on the above:</p> <p>If the AC pertains only to the TSC or only to the OSC, the ITA needs to be performed only for the center specified in the AC. It would be absurd to require performance of the ITA for a center not specified in the AC.</p> <p>849, 852, and 853: For ITAAC 849, an inspection is sufficient for the reasons discussed above. For ITAAC 852 a similar argument applies the Tier 1 definition of an inspection includes a walkdown which would be the appropriate means of verification for this ITAAC. Testing to verify something is not present would be an absurd requirement or expectation. For 853 again a similar argument applies the Tier 1 definition of an inspection includes a walkdown which would be the appropriate verification method for this ITAAC. Testing to verify the location of something would be an absurd requirement or expectation and not conform to the definition of a test in Tier 1..</p> <p>850, 854, 855, 856, 857: Both an inspection and test is required.</p> <p>851 and 858: Both an inspection and test is required. However, the COL and Tier 1 definition of “inspect for retrievability” includes both an inspection and test. Specifically, inspect for retrievability of a display means to visually observe that the specified information appears on a monitor when summoned by the operator. This activity is a combined inspection/test. Thus, an inspection for retrievability satisfies the ITA requirement.</p> <p>The ITAAC closure notification should clearly discuss the activities performed to satisfy the ITA and where required provide a clear justification why an activity was not performed or was performed only for the TSC or OSC. Providing this basis is important to document why the licensee did not perform the entirety of the ITA as stated in the COL.</p>

Attachment provided by licensee

No.	ITAAC No.	Program Commitment	Inspections, Tests, Analyses	Acceptance Criteria	Test/Inspection
849	E.3.9.05.01.01	5.1 The licensee has established a technical support center (TSC) and an onsite operations support center (OSC). [H.1]	5.1 An inspection of the as-built TSC and OSC will be performed, including a test of the capabilities.	5.1.1 The TSC has at least 2,175 square feet of floor space.	Inspection
850	E.3.9.05.01.02	5.1 The licensee has established a technical support center (TSC) and an onsite operations support center (OSC). [H.1]	5.1 An inspection of the as-built TSC and OSC will be performed, including a test of the capabilities.	5.1.2 Communication equipment is installed in the TSC and OSC, and voice transmission and reception are accomplished.	Test
851	E.3.9.05.01.03	5.1 The licensee has established a technical support center (TSC) and an onsite operations support center (OSC). [H.1]	5.1 An inspection of the as-built TSC and OSC will be performed, including a test of the capabilities.	5.1.3 The plant parameters listed in UFSAR Table 7.5-1, <i>Post-Accident Monitoring System</i> , can be retrieved and displayed in the TSC.	Inspection
852	E.3.9.05.01.04	5.1 The licensee has established a technical support center (TSC) and an onsite operations support center (OSC). [H.1]	5.1 An inspection of the as-built TSC and OSC will be performed, including a test of the capabilities.	5.1.4 The TSC is located within the protected area, and no major security barriers exist between the TSC and the control room.	Inspection
853	E.3.9.05.01.05 (ICN accepted by NRC)	5.1 The licensee has established a technical support center (TSC) and an onsite operations support center (OSC). [H.1]	5.1 An inspection of the as-built TSC and OSC will be performed, including a test of the capabilities.	5.1.5 The OSC is located in the Maintenance Support Building.	Inspection
854	E.3.9.05.01.06	5.1 The licensee has established a technical support center (TSC) and an onsite operations support center (OSC). [H.1]	5.1 An inspection of the as-built TSC and OSC will be performed, including a test of the capabilities.	5.1.6 The TSC ventilation system includes a high-efficiency particulate air (HEPA) and charcoal filter, and radiation monitors are installed	Inspection
855	E.3.9.05.01.07	5.1 The licensee has established a technical support center (TSC) and an onsite operations support center (OSC). [H.1]	5.1 An inspection of the as-built TSC and OSC will be performed, including a test of the capabilities.	5.1.7 A reliable and backup electrical power supply is available for the TSC.	Inspection
856	E.3.9.05.01.08	5.1 The licensee has established a technical support center (TSC) and an onsite operations support center (OSC). [H.1]	5.1 An inspection of the as-built TSC and OSC will be performed, including a test of the capabilities.	5.1.8 Controls and displays exist in the TSC to control and monitor the status of the TSC ventilation system including heating and cooling, and the activation of the HEPA and charcoal filter system upon	Test

No.	ITAAC No.	Program Commitment	Inspections, Tests, Analyses	Acceptance Criteria	Test/Inspection
				detection of high radiation in the TSC.	
857	E.3.9.05.02.01	5.1 The licensee has established a technical support center (TSC) and an onsite operations support center (OSC). [H.1]	5.1 An inspection of the as-built TSC and OSC will be performed, including a test of the capabilities.	5.2.1 Voice transmission and reception are accomplished between the EOF and the control room.	Test
858	E.3.9.05.02.02	5.1 The licensee has established a technical support center (TSC) and an onsite operations support center (OSC). [H.1]	5.1 An inspection of the as-built TSC and OSC will be performed, including a test of the capabilities.	5.2.2 The plant parameters listed in UFSAR Table 7.5-1, <i>Post-Accident Monitoring System</i> , can be retrieved and displayed in the EOF.	Inspection