

Vogle PEmails

From: Hoellman, Jordan
Sent: Friday, March 30, 2018 8:46 AM
To: Vogle PEmails
Subject: SNC Responses to ICN/UIN Comment Status Sheet
Attachments: UIN ICN comment status sheet for March 22 with responses.pdf

Attached are SNC's responses to the staff's comments on ICN/UINs discussed at the public meeting on 3/29/2018.

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VOGTLE ICN/UIN ISSUES TRACKING SHEET

Date	ITEM #	ICN UIN	TOPIC	ITAAC INDEX #	ISSUE	Licensee Comment
3/20	1	UIN	Component hydrostatic test	459, 72, 91, 13, 220, 120, 431 and DRAFT 159	These UINs credit completion of the ITAAC for hydrostatic testing of the ASME Section III components listed in the various tables using the vendor’s hydrostatic test of the components. The staff previously rejected the ICNs submitted by SNC that credited completion of this ITAAC by using the ASME required vendor hydrostatic test of the components. These ITAAC are for the as-built system hydrostatic test required by the code prior to placing the system in service.	The consolidated ASME UINs that SNC has been submitting since Jan are formatted differently than the version that was discussed at the Dec 12 tabletop. The 2018 ASME UIN submittals (459, 72, 91, 13, 220, 120, 431, DRAFT 159) utilize the specific NEI template component/piping wording in their entirety in the submittal while the version discussed at the tabletop combined the component and piping discussions. Specifically, for UIN 13: the first 3 paragraphs in the Acceptance Criteria 4.a) and 4.b) discussion is the text directly from the NEI D-28 template for component hydro testing. The next 3 paragraphs in 4.a) and 4.b) are the exact text from NEI template D-31 for piping hydro. The final paragraph (also from the NEI D-31 template) summarizes that the code data reports will contain the results of the component and piping hydro testing per the ASME code requirements.
3/20	2	UIN	RCS design and constructed	13	The staff wants to understand the purpose of the note below Table Attachment B. UFSAR Section 5.2.1.1 is applicable to all RCPB components and piping. Therefore, the note below Table Attachment B is confusing as it appears to be pertaining only to RCS-L069A/B. In addition, the structure of the note also appears to imply that the 1989 Addenda to the 1989 Edition of the ASME Section III Code can be used for socket welded connections, which is contradictory to UFSAR Section 5.2.1.1	The footnote in Attachment B was added to clarify where the ASME III 1989 Edition Code is required in the RCS piping lines. The RCS system follows the 1998 Edition, 2000 Addenda and the 1989 Edition where required. In the RCS system, there is only one line where the 1989 Edition is applicable so that is the line designated by a “+” in the Attachment B table. We are proposing to re-word the footnote to state: “+ For girth fillet welds between piping and socket welded fittings, valves and flanges, refer to VEGP UFSAR Section 5.2.1.1 (Reference x).”

3/20	3	UIN	Functional capability	DRAFT 159	The Tier 1 definition of inspection includes inspections of reports/documents. The ITAAC's acceptance criteria requires that a report exists and conclude the piping maintains functional capability. The IDB is clear the inspection was of a report based on the as-built piping system following its inspection and reconciliation with design requirements. Accordingly, this satisfies the requirements of the ITA and AC.	SNC noted the ITA for ITAAC 159 is different from the other ITAAC for piping functional capability. ITAAC 159 specifies an inspection will be performed verifying functional capability while the other ITAAC for functional capability specify an inspection will be performed for the existence of a report verifying functional capability. RESOLVED and discussed on 03.22.18 public call.
3/21	4	UIN	Environmental Qualification	98	The completion description for part 6d.i (non class 1E section) does not reference the USFAR like the class 1E section does, and like the other UINs for harsh EQ. We have previously indicated the need to provide the reference to where in the UFSAR the qualification info is located.	SNC will add the additional sentence "Additional information about the methods used to qualify electrical penetrations supplied for the AP1000 is provided in the UFSAR Appendix 3D (Reference 6)" to Acceptance Criteria i) (non class 1E). Since UIN 98 is already slated for resubmittal to provide a revised table (Attachment), the above change will also be incorporated in the resubmittal version.