

Vogle PEmails

From: Hoellman, Jordan
Sent: Wednesday, June 13, 2018 8:56 AM
To: Stacy, Kara M. (KMSTACY@southernco.com)
Cc: Vogle PEmails
Subject: Summary Response for Clarification Questions for Cable Separation and Fire Area ITAAC
Attachments: Summary Response for UIN 789-811 Comments.docx

Please see the attached summary of the clarification questions for Cable Separation and Fire Area ITAAC (ITAAC Index Nos. 789-811), in response to SNC's responses and draft UIN re-submittals dated June 11, 2018 (ADAMS Accession No. ML18162A352).

These ITAAC will be discussed at a future public meeting.

Thank you,
Jordan

Hearing Identifier: Vogtle_COL_Docs_Public
Email Number: 303

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Subject: Summary Response for Clarification Questions for Cable Separation and Fire Area ITAAC
Sent Date: 6/13/2018 8:55:49 AM
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From: Hoellman, Jordan

Created By: Jordan.Hoellman2@nrc.gov

Recipients:

"Vogtle PEmails" <Vogtle.PEmails@nrc.gov>

Tracking Status: None

"Stacy, Kara M. (KMSTACY@southernco.com)" <KMSTACY@southernco.com>

Tracking Status: None

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Summary Response for UIN Comments

ITAAC Index Nos. 789 – 811

On April 19th, the staff provided its first set of seven comments/questions for the submitted uncompleted ITAAC notifications (UINs) covering ITAAC index numbers 789 - 794, 797 and 798, and 800 - 811. Clarification of the staff's concerns/questions was provided to Southern Nuclear Company (SNC) on May 3rd in the form of nine additional questions/comments. On May 10th, the staff erroneously submitted a duplicate comment to SNC on ITAAC index number 797 which had been raised in the May 3rd clarification question / comment submittal.

The staff engaged SNC to ensure there was a common understanding of the ITAAC scope, and to discuss concerns regarding the clarity and sufficiency of information contained in UINs.

Specifically, staff engaged SNC on April 19 and May 10 during routine scheduled Thursday public teleconferences and on May 29 and May 31 in a non-public call to provide further clarification of the staff's comments and specific concerns regarding the subject UINs.

The staff has reviewed SNC's written responses submitted on June 11 and considered information provided during the various teleconferences. The staff notes that several of its comments/requests (identified below) were purely suggestions / recommendations to improve the overall quality and content of several previously accepted UINs. As these items were only a suggestion and not required to obtain the minimum required information they are being withdrawn as formal comments.

The following summarizes the resolution / action required for the 16 submitted questions / comments.

Part 1: Seven comments / questions dated April 19.

1. No action is required. Your submittal of four separate enclosures under one cover letter is acceptable. Comment withdrawn.
2. SNC proposed to add "completed cable installation" to the second sentence of the second paragraph of UINs 800-811. The sentence is repeated in each of these UINs. Deletion of the additional information regarding pulling cables and termination tickets is acceptable.
3. No action is required. Following incorporation of Item 2 above, the UIN determination basis for UINs 800, 801 and 802 will contain sufficient information to establish that SNC has affirmed based on inspection that the cable separation requirements in the ITAAC AC were met. Comment withdrawn.
4. Though it may be difficult for someone to locate the enclosure referenced, the reference is not incorrect. Comment withdrawn.
5. No action is required. No technical or legal requirement exists to follow any given order or preference when invoking an approved alternative. Comment withdrawn.
6. No action is required. Definition added to UFSAR section 8.3.2.4.2. Comment withdrawn.

7. No action is required. The staff's comment was only a recommendation to improve the overall quality and content of the previously accepted UIN. The comment is withdrawn.

Part 2: Nine clarification comments / questions provided on May 3

1. No action required. The staff agrees the ITAAC scope does not include internal raceways within cabinets and switchboards. ITAAC 789, 790, 791, 792, 793 and 794 address whether division cables are in their own raceways.
2. SNC is to add wording to UINs 803, 804, 805 to clarify barrier installation and inspection requirements.
3. SNC is to add wording to clarify the analysis is performed per IEEE 384 and demonstrates that the effects of lesser separation do not impact the ability of Class 1E circuits to perform their safety function.
4. No action is required. The staff's comment was a recommendation to improve the content of UIN. Comment withdrawn.
5. No action is required. The staff agrees the UINs can be submitted under one cover letter. Comment withdrawn.
6. No action is required. See response to Part 1 comment 5. Comment withdrawn.
7. No action is required. Inspections are performed to verify a fire barrier exists. Comment withdrawn.
8. No action is required. The staff's comment was only a recommendation to improve the overall quality and content of the previously accepted UIN. The comment is withdrawn.
9. No action is required. The staff's comment was only a recommendation to improve the overall quality and content of the previously accepted UIN. The comment is withdrawn.