

July 13, 2018

MEMORANDUM TO: Timothy J. McGinty, Director  
Division of Construction Inspection  
& Operational Programs  
Office of New Reactors

William B. Jones, Director  
Division of Construction Oversight  
Region II

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Office of New Reactors

SUBJECT: VOGTLE ELECTRIC GENERATING PLANT UNITS 3 & 4  
ITAAC PRIORITIZATION UPDATE FOLLOWING LICENSE  
AMENDMENTS 1-123 FOR VOGTLE 3 AND 1-122 FOR  
VOGTLE 4

Appendix C of the combined license (COL) contains the inspections, tests, and analyses the licensee must perform and the acceptance criteria which must be met prior to authorization to commence operations. Appendix C originally contained 819 ITAAC from Revision 19 of the AP-1000 design control document (DCD) plus 56 site-specific ITAAC, totaling 875 initial ITAAC entries for Unit 3 and Unit 4 respectively. Six ITAAC on Unit 4 were deleted on initial issuance of the COL with credit being given for their performance on Unit 3 (Unit 4 index numbers: 733, 849, 852, 854, 855, and 856).

Expert panels were convened for the purpose of determining the AP-1000 ITAAC to be targeted for NRC inspection. As a result of the targeting process, 343 ITAAC were initially targeted for inspection on Unit 3 and 337 ITAAC on Unit 4. The ITAAC targeted for NRC inspection included all emergency planning, security, and design acceptance criteria (DAC) ITAAC and those ITAAC with a prioritization rank of greater than or equal to 0.4.

Since initial targeting of the ITAAC within the COLs, as of June 6, 2018, 123 license amendments have been issued for Vogtle unit 3 and 122 license amendments have been issued for Vogtle unit 4. The impact of these license amendments on the COL ITAAC has been significant, for each unit:

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- 431 ITAAC entries have been deleted,
- 196 ITAAC have been revised, and
- 5 new ITAAC have been added.

The current total number of active ITAAC stands at 449 for Unit 3 and 443 for Unit 4. Despite the large number of ITAAC entries deleted, the number of discrete ITAAC activities remains essentially unchanged as the actual ITAAC activities were merely consolidated into an existing ITAAC. Not captured in this review summary are those license amendments which only modified one or more of the existing tables and figures within Appendix C of the COL. Though these changes have no impact on the targeting process they do impact the scope of the ITAAC that refer to the affected tables and figures and these changes should be appropriately considered during inspection planning and ITAAC closure.

The greatest impact on the ITAAC resulted predominantly from the following three license amendments to consolidate ITAAC and to eliminate ITAAC activities found to be redundant with other existing ITAAC.

- License amendment 85/84
  - deleted 6 functional arrangement ITAAC (505, 521, 554, 592, 596, and 627) from each unit
  - deleted 79 reference ITAAC from each unit
  - deleted 144 ITAAC entries in each unit by consolidating the specific ITAAC activity into another existing ITAAC
  - revised 49 existing ITAAC in each unit as a result of consolidating ITAAC activities
- License amendment 95/94
  - deleted 10 emergency planning ITAAC activities in each unit which were bounded by other EP ITAAC
  - revised 10 emergency planning ITAAC in each unit
- License amendment 113/112
  - deleted 190 ITAAC entries in each unit by consolidating the specific ITAAC activity into another existing ITAAC
  - revised 57 existing ITAAC in each unit as a result of consolidating ITAAC activities

As part of this update, several errors were identified with respect to the official targeted ITAAC list entered into ADAMS and or the CIPIMS data base. This memo will serve to correct these errors.

- ITAAC 520, 641, 642, 643, and 738, all reference ITAAC, were incorrectly added to the targeted ITAAC list. These five reference ITAAC were deleted by LAs 85 and 84.
- ITAAC 677, 698 and 699 were shown as non-targeted. Per Commission policy all emergency planning ITAAC are to be targeted for inspection, ITAAC 677 has been targeted. ITAAC 698 and 699 were deleted by LA 113/112 and the activity incorporated into ITAAC 700 which has been added to the targeted ITAAC list.
- ITAAC 860 and 861 were identified as non-targeted, these EP ITAAC were previously identified as targeted and may have been incorrectly entered into CIPIMS as non-targeted. ITAAC 860 and 861 have been changed to Targeted ITAAC.

It is important to understand that the consolidation license amendments (LA) 85/84, 95/94, and 113/112 do not impact the placement of the ITAAC activities into the ITAAC Matrix and therefore their assigned family. Nor do these changes impact the outcome of the official prioritization (i.e. targeting) process. The ITAAC Matrix was created and used to assign each unique ITAAC “activity” (not ITAAC) into a specific or unique family that the expert panel felt best represented the ITAAC’s specific construction activities. Consolidating the ITAAC activities under a different ITAAC number does not change the family for that ITAAC activity. The need to assign each individual ITAAC activity into a single ITAAC family was the original reason the DCD ITAAC were broken up into individual line items.

The provided attachments reflect the targeted status for each ITAAC in Appendix C of the COLs for Vogtle Unit 3 and Vogtle Unit 4 as of June 6, 2018 and reflect license amendments 1 through 123 for Vogtle Unit 3 and 1 through 122 for Vogtle Unit 4. Attachment A list the ITAAC sequentially by ITAAC index number and Attachment B lists the ITAAC by Family. These two attachments represent the official list of Targeted ITAAC and their assigned ITAAC Family.

This official listing of the “Targeted” ITAAC and their assigned families will be the basis upon which the baseline construction inspection program completion will be verified. The ITAAC activities will continue to be inspected by the NRC using the inspection procedures (IPs) related to the family designator as shown in the attached file as the minimum inspection requirement. The baseline inspection program requirement to complete all high level steps for the associated IPs for the “Official” family designator is required. Therefore, the attached tables are the official targeted lists that will be used by RII, in conjunction with CIPIMS, when determining which IPs should be used for inspection, and when determining if the baseline inspection program has been completed. Previous inspections and findings for the consolidated ITAAC will be credited under the new consolidated ITAAC.

Due to the limitations of the CIPIMS program, CIPIMS can only have one family designator and one inspection status (i.e. targeted or non-targeted) for each ITAAC entry. This limitation does not support the licensee’s ITAAC consolidation. Previously a single ITAAC entry (i.e. index number) consisted of a single activity. Due to consolidation, a single index number now may be comprised of several activities each originally with its own family designator and targeted status. Due to the aforementioned limitations and Region II’s established protocol with respect to publishing the ITAAC family designator and target status in the inspection report write-ups for each ITAAC, Region II’s Division of Construction Oversight modified the data in CIPIMS such that for each new consolidated ITAAC the original ITAAC family designator established for that particular ITAAC number is applied to all of the consolidated activities within that given ITAAC. With regard to targeting, the entire consolidated ITAAC is targeted if any one or more of its parts was previously targeted. As a result, the ITAAC data in CIPIMS is not always consistent with the “official” family assignments and original targeted status for each of the specific ITAAC activities identified in the two attachments provided.

Future license amendments will be reviewed per Appendix D of office instruction NRO-REG-102 and additional updates to this memo will be provided on a periodic basis as needed.

On June 6, 2018, Christopher Welch presented the results from NRO-REG-102, Appendix D screening process for Vogtle unit 3 license amendments 1 through 123 and Vogtle unit 4 license amendments 1 through 122 to a panel of NRC staff with significant ITAAC experience for final approval. The panel members included: Edward Kleeh, James Gaslevic, and Ian Cozens.

Based on the outcome of this review, 240 ITAAC are targeted out of 449 (53.5%) for Vogtle unit 3 and 234 are targeted out of 443 (52.8%) for Vogtle unit 4.

Attachment 1, Targeted ITAAC Listing Vogtle Units 3 and 4, dated June 8, 2018 (ML18184A510)

Attachment 2, ITAAC Family Listing Vogtle Units 3 and 4, dated June 8, 2018 (ML18184A508)

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PRIORITIZATION UPDATE FOLLOWING LICENSE AMENDMENTS  
1-123 FOR VOGTLE 3 AND 1-122 FOR VOGTLE 4 Dated: July 13, 2018

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