

Vogle PEmails

From: Habib, Donald
Sent: Friday, May 31, 2019 2:46 PM
To: Vogle PEmails
Subject: Vogle June 13 Meeting Presentation - Time Between ITAAC Complete and 103g (003).pdf
Attachments: June 13 Meeting Presentation - Time Between ITAAC Complete and 103g (003).pdf

Hearing Identifier: Vogtle_COL_Docs_Public
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Subject: Vogtle June 13 Meeting Presentation - Time Between ITAAC Complete and 103g (003).pdf
Sent Date: 5/31/2019 2:45:46 PM
Received Date: 5/31/2019 2:45:50 PM
From: Habib, Donald

Created By: Donald.Habib@nrc.gov

Recipients:
"Vogtle PEmails" <Vogtle.PEmails@nrc.gov>
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MESSAGE	3	5/31/2019 2:45:50 PM
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Time Between ITAAC Complete Letter and 103(g)

June 13, 2019



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November 2020 ICNs

62 Unit 3 ICNs in last quarter before 103(g)

Final 8 ICNs planned for submittal

- 120 – PCS ASME – **Targeted***
- 126 – PCS EQ - **Targeted**
- 133 – PCS components signaled from assigned division
- 137 – PCS PCCWST standpipe elevations
- 138 – PCS wetted perimeter – **Targeted***
- 145 – PCS PCCWST to SFP delivery rate
- 331 – FPS PCS flowrate - **Targeted**
- 815 – PCS leak chase flow measurement – **Targeted**

*Potentially more complex



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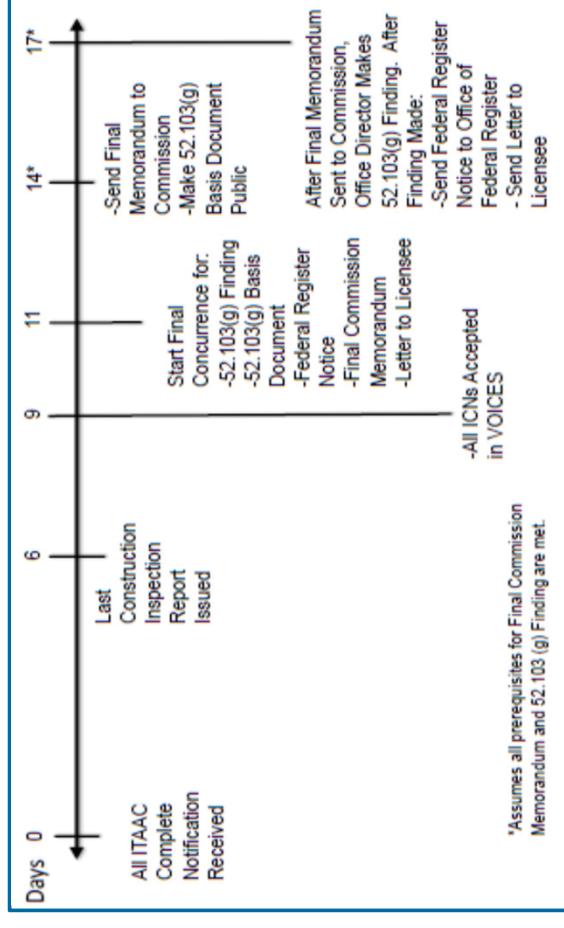
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Time from ITAAC Complete Letter to 103(g)

- LIC-114 provides 17 day timeline from ITAAC Complete Letter to 103(g).
- Today, this process is critical path for 15 days.
- SNC is working to determine what we need to do for this time to be as short as possible – preferably less than 10 days.
- SNC ITAAC Group will work closely with NRC on a daily basis during the last quarter.

- To minimize Unit 4 ICNs during that period.
- To assure all last quarter ICNs have UJINs;
- To inform of schedule;
- To assure test procedures and draft products are provided well ahead of the ICN being issued;
- To expedite any licensee activity to support NRC



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Example 1 – Projected Worst Case Single ICN Wetted Perimeter Test

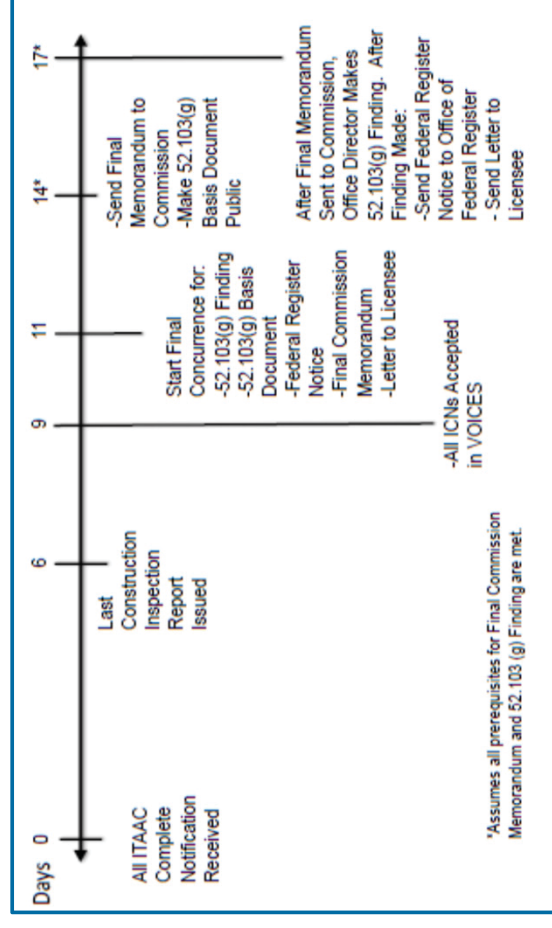
- **UIN**
 - SNC develops test procedures, etc. for UIN submittal by mid-2019
 - Submit UIN containing methodology in late-2019 after LAR is submitted and approved
 - UIN processed by NRC in early 2020
- **ICN**
 - SNC provides all expected final products in draft by T = -90 days
 - Test conducted at T = -2 days with NRC Region 2 observing; test passes
 - ICN letter submitted at T = 0 days
 - ICN all complete letter submitted at T = 0 days
- **Region 2 Inspection Report**
 - NRC Region 2 develops draft inspection report based on UIN and test procedure outside of 17 day window
 - Region to determine if inspection report can be in CIPIMS < 6 days

- **All ICNs accepted; concurrence for 103(g)**

- NRO to address if times can be improved by running in parallel; having draft products ready; and what SNC needs to do to support



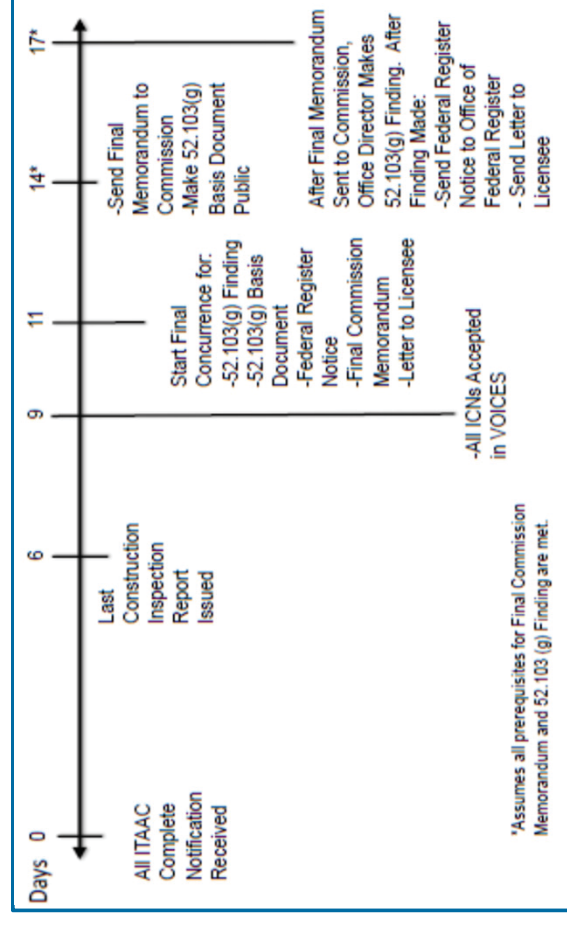
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Example 2 – Projected Best Case Single ICN

Non-Targeted ITACC such as PCCWST Standpipe Elevations

- **UIN**
 - SNC develops test procedures, etc. for UIN submittal by mid-2019
 - Submit UIN containing methodology in mid-2019; this UIN already submitted and accepted by NRC
 - UIN processed by NRC in 2019
- **ICN**
 - SNC provides all expected final products in draft by T = -90 days
 - Measurement made at T = -1 days
 - ICN letter submitted at T = 0 days
 - ICN all complete letter submitted at T = 0 days
- **Region 2 Inspection Report**
 - No inspection report required - time saved is 6 days.
- **All ICNs accepted; concurrence for 103(g)**
 - NRO to address if times can be improved by running in parallel; having draft products ready; and what SNC needs to do to support



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Post Closure Notification Scenarios

Situation (Example in NEI 08-01, Page H-13):

- ICN has been submitted
- Two days prior to 103(g), surveillance finds impeller issue causing high vibration
- Impeller same design but different material.

Scenario – Engineering change, re-test per ITAAC:

- Condition report generated.
- Post work verification same as original test.
- No notification or PCN required

ITAAC No 2.3.6.9biii

The RNS provides heat removal from the reactor coolant during shutdown operations	Testing will be performed to confirm that the RNS can provide sufficient flow	Each RNS pump provides a t least 1400 gpm net flow to the RCS when the hot leg water level is at an elevation 15.5 ± 2 inches above the bottom of the hot leg
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Post Closure Notification Scenarios

Situation:

- ICN has been submitted
- Two days prior to 103(g), heaters fail taking rated capacity below 168 KW.

First Scenario – Direct replacement, re-test per ITAAC:

- Condition report generated.
- No notification or PCN required
- Pressurizer not required for fuel load

ITAAC No 2.1.02.09b.i

The RCS provides the means to control system pressure	It will be performed to verify the rated capacity of pressurizer heater backup groups A and B	Pressurizer heater backup groups A and B each have a rated capacity of at least 168 KW.
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Second Scenario – Direct replacement, use different method to demonstrate acceptance criteria

- Condition report generated
- Per NEI 08-01, Section 8.3, SNC will notify the NRC within 24 hours
- After completion of the repair and determination that acceptance criteria are met, SNC to submit PCN per 10 CFR 52.99(c)(2).
- Impact and actions relative to 52.103(g) decision will need to be considered.



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Vogtle 3&4



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