

September 2, 2022

Docket Nos.: 52-026

ND-22-0709
10 CFR 50.90
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U.S. Nuclear Regulatory Commission
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Washington, DC 20555-0001

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
Request for License Amendment and Exemption:
Electrical Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Optimization
(LAR-22-003)

Ladies and Gentlemen:

Pursuant to 10 CFR 52.98(c), and in accordance with 10 CFR 50.90, Southern Nuclear Operating Company (SNC) requests an amendment to the combined license (COL) for Vogtle Electric Generating Plant (VEGP) Unit 4 (License Number NPF-92). The requested amendment proposes changes to Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) in COL Appendix C, with corresponding changes to the associated plant-specific Tier 1 information. Pursuant to the provisions of 10 CFR 52.63(b)(1), an exemption from elements of the design as certified in the 10 CFR Part 52, Appendix D, design certification rule is also requested for the plant-specific Design Control Document (DCD) Tier 1 material departures.

The requested amendment proposes changes to COL Appendix C (and plant-specific Tier 1) to a) remove ITAAC for which the closure activities duplicate activities needed to close other ITAAC, and b) consolidate a number of ITAAC to improve efficiency of the ITAAC completion and closure process.

Enclosure 1 provides the description, technical evaluation, regulatory evaluation (including the Significant Hazards Consideration Determination), and environmental considerations for the proposed changes in the License Amendment Request (LAR).

Enclosure 2 provides the background and supporting basis for the requested exemption.

Enclosure 3 provides markups depicting the requested changes to COL Appendix C and corresponding changes to plant-specific Tier 1.

This letter contains no regulatory commitments. This letter has been reviewed and confirmed to not contain security-related information.

SNC requests staff approval of the license amendment by January 7, 2023, to achieve the maximum benefits of the changes proposed by this LAR. SNC expects to implement the proposed amendment (through incorporation into the licensing basis documents) within 30 days of approval of the requested changes.

Expedited NRC reviews are requested based on the following:

- The requested review time and subsequent implementation, should NRC approve the LAR, provides the Licensee sufficient time to organize the ITAAC closure approach to incorporate the consolidated methodology for ITAAC Closure Notifications (ICNs).
- The earlier the changes proposed by this LAR are approved, the sooner the ITAAC closure process efficiencies will be realized for all stakeholders.

In accordance with 10 CFR 50.91, SNC is notifying the State of Georgia of this LAR by transmitting a copy of this letter and enclosures to the designated State Official.

Should you have any questions, please contact Ms. Amy Chamberlain at (205) 992-6361.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 2nd day of September 2022.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "B. H. Whitley", is written over a horizontal line.

B. H. Whitley
Regulatory Affairs Director
Southern Nuclear Operating Company

- Enclosures:
- 1) Vogtle Electric Generating Plant (VEGP) Unit 4 - Request for License Amendment: Electrical Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Optimization (LAR-22-003)
 - 2) Vogtle Electric Generating Plant (VEGP) Unit 4 – Exemption Request: Electrical Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Optimization (LAR-22-003)
 - 3) Vogtle Electric Generating Plant (VEGP) Unit 4 - Proposed Changes to the Licensing Basis Documents (LAR-22-003)

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cc: Regional Administrator, Region II
VPO Project Manager
Senior Resident Inspector – Vogtle 3 & 4
Director, Environmental Protection Division - State of Georgia
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Southern Nuclear Operating Company

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Enclosure 1

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

Request for License Amendment:

**Electrical Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Optimization
(LAR-22-003)**

(This Enclosure consists of 32 pages, including this cover page.)

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5. ENVIRONMENTAL CONSIDERATIONS

Pursuant to 10 CFR 52.98(c), and in accordance with 10 CFR 50.90, Southern Nuclear Operating Company (SNC) (the "Licensee") hereby requests an amendment to Combined License (COL) No. NPF-92, for Vogtle Electric Generating Plant (VEGP) Unit 4.

1. SUMMARY DESCRIPTION

The proposed changes would make non-technical changes to COL Appendix C (and corresponding plant-specific Tier 1) information. The changes revise Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC), to a) remove ITAAC that duplicate activities needed to close other ITAAC, and b) consolidate a number of ITAAC to improve efficiency of the ITAAC completion and closure process.

- a) The proposed changes (herein identified as Category a) include removal of several duplicative ITAAC that are related to verification of Class 1E equipment being signaled from an assigned division. These ITAAC are covered by the electrical ITAAC. These ITAAC include:

Index No	Subsection	System Name
26	2.1.2	Reactor Coolant System (RCS)
83	2.1.3	Reactor System (RXS)
103	2.2.1	Containment System (CNS)
172	2.2.3	Passive Core Cooling System (PXS)
233	2.2.4	Steam Generator System (SGS)
263	2.2.5	Main Control Room Emergency Habitability System (VES)
296	2.3.2	Chemical and Volume Control System (CVS)
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399	2.3.7	Spent Fuel Pool Cooling System (SFS)
878	2.3.10	Liquid Radwaste System (WLS)
467	2.3.13	Primary Sampling System (PSS)
527	2.5.2	Protection and Safety Monitoring System (PMS)
582	2.6.1	Main ac Power System (ECS)
687	2.7.1	Nuclear Island Nonradioactive Ventilation System (VBS)

- b) The proposed changes (herein identified as Category b) include consolidation of a number of Section 3.3 electrical cable and raceway color coding and separation ITAAC to improve efficiency of the ITAAC completion and closure process. These ITAAC include:

- Combining ITAAC 789, 792, 803, 806, and 809 into the existing single ITAAC 800. In the plant-specific Tier 1 document these are identified in Table 3.3-6 as ITAAC Design Commitment 7.a Acceptance Criterion a, ITAAC Design Commitment 7.b Acceptance Criterion a, ITAAC Design Commitment 7.d Acceptance Criterion iii.a, ITAAC Design Commitment 7.d Acceptance Criterion iv.a, and ITAAC Design Commitment 7.d Acceptance Criterion v.a, to be incorporated into ITAAC Design Commitment 7.d with its existing Acceptance Criteria ii.a related to electrical equipment routing inside containment.

- Combining ITAAC 790, 793, 804, 807, and 810 into the existing single ITAAC 801. In the plant-specific Tier 1 document these are identified in Table 3.3-6 as ITAAC Design Commitment 7.a Acceptance Criterion b, ITAAC Design Commitment 7.b Acceptance Criterion b, ITAAC Design Commitment 7.d Acceptance Criterion iii.b, ITAAC Design Commitment 7.d Acceptance Criterion iv.b, and ITAAC Design Commitment 7.d Acceptance Criterion v.b, to be incorporated into ITAAC Design Commitment 7.d with its existing Acceptance Criteria ii.b related to electrical equipment routing within the non-radiologically controlled area of the auxiliary building.
- Combining ITAAC 791, 794, 805, 808, and 811 into the existing single ITAAC 802. In the plant-specific Tier 1 document these are identified in Table 3.3-6 as ITAAC Design Commitment 7.a Acceptance Criterion c, ITAAC Design Commitment 7.b Acceptance Criterion c, ITAAC Design Commitment 7.d Acceptance Criterion iii.c, ITAAC Design Commitment 7.d Acceptance Criterion iv.c, and ITAAC Design Commitment 7.d Acceptance Criterion v.c, to be incorporated into ITAAC Design Commitment 7.d with its existing Acceptance Criteria ii.c related to electrical equipment routing within the radiologically controlled area of the auxiliary building.

The purpose of the proposed changes being requested is to:

- Reduce the forthcoming Unit 4 surge in ITAAC closures without compromising completion of the approved design, resulting in a reduction of both Licensee and Regulator resources.
- Reduce the number of ITAAC Closure Notification (ICNs) and regulatory burden for SNC and the NRC.
- Obtain formal upfront NRC review and approval to consolidate related ITAAC that rely on the same closure documentation.

Consolidation will not result in removal of any quality activity/design attribute or safety margin.

2. DETAILED DESCRIPTION AND TECHNICAL EVALUATION

Updated Final Safety Analysis Report (UFSAR) Tier 2 design descriptions are derived from plant design documents and the Tier 1 design information is “derived from Tier 2 information” as noted in 10 CFR Part 52, Appendix D, Section II.D. However, certain examples have been identified in COL Appendix C (and plant-specific Tier 1) to contain redundant ITAAC requirements or require completion of duplicative activities that may be completed at the same time. For each of the proposed changes described and evaluated below, COL Appendix C (and plant-specific Tier 1) changes are proposed to consolidate two or more ITAAC or to remove those that are directly duplicative. For each of the ITAAC proposed for consolidation or removal, the associated UFSAR design information is consistent with the current plant design, so no structure, system, or component (SSC), design function, or analysis, as described in the UFSAR, is affected by the proposed changes.

For each Category below, multiple ITAAC are proposed for consolidation or removal to allow a single completion package and ICN for each resulting ITAAC.

Category a) – “Assigned Division” ITAAC

Multiple ITAAC, referred to as “assigned division” ITAAC, require testing to confirm that a simulated test signal exists at the identified system Class 1E equipment when the assigned Class 1E division is provided a test signal. However, the functions covered by these ITAAC are also covered by the electrical ITAAC, resulting in unnecessary and burdensome duplication for the licensee.

The Unit 3 Uncompleted ITAAC Notifications (UINs) identify that the Assigned Division ITAAC are satisfied by verifying that the power supply cables/wiring are installed and terminated using approved construction drawings and cable/wiring termination documentation and that continuity testing is performed on each of the installed cables/wiring to confirm current flow within the installed cable/wiring. This scope is accomplished by the Quality Control Inspection Reports (QCIRs) for the specified Class 1E cable terminations.

The Electrical ITAAC also include the same QCIRs for Class 1E cable terminations in containment and the auxiliary building; thus, the assigned division ITAAC are redundant. (Note that these electrical ITAAC are the subject of the consolidation requested in Category b of this LAR, and thus shown therein.)

Electrical ITAAC are satisfied by the collection of QCIRs within containment, the non-radiologically controlled area of the auxiliary building, and the radiologically controlled area of the auxiliary building, which include:

- Class 1E cable installation,
- Class 1E cable termination (i.e., a subset of QCIRs satisfy Assigned Division ITAAC document cable termination and continuity testing), and
- Raceways that route Class 1E cables installation.

In addition to the implementing documentation being redundant, the Assigned Division ITAAC scope can also be accomplished by a combination of other ITAAC and licensing basis requirements. The Class 1E cables associated with the selected Assigned Division ITAAC within this LAR are located within containment or the auxiliary building. ITAAC 792, 793, and 794 verify that the Class 1E cables (within containment, the non-radiologically controlled area of the auxiliary building, and the radiologically controlled area of the auxiliary building, respectively) associated with only one division are routed in raceways assigned to the same division and that there are no other safety division electrical cables in a raceway assigned to a different division. In order for these ITAAC to be met, Class 1E cables between the power source and end components must be connected only to their assigned division (i.e., cables have been routed in the correct raceway and terminated to the correct component from its assigned division according to the design). The assigned division components also get tested to demonstrate specific functions, and thus are powered, via multiple ITAAC and licensing basis requirements. Therefore, the two key attributes of meeting the Assigned Division ITAAC, (1) raceway installation, cable installation, and cable termination per design and (2) continuity testing (i.e., component is powered), are demonstrated by (1) ITAAC 792, 793,

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and/or 794 and (2) the ITAAC and licensing basis requirements described under each ITAAC below. Accordingly, the assigned division ITAAC shown below are proposed to be deleted.

COL Appendix C ITAAC 2.1.02.07b, index number 26 (plant-specific Tier 1 Table 2.1.2-4, ITAAC No. 7.b) for the Reactor Coolant System (RCS) is an ITAAC that requires assigned division testing.

Table 2.1.2-4 Inspections, Tests, Analyses, and Acceptance Criteria		
Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
7.b) The Class 1E components identified in Table 2.1.2-1 are powered from their respective Class 1E division.	Testing will be performed on the RCS by providing a simulated test signal in each Class 1E division.	A simulated test signal exists at the Class 1E equipment identified in Table 2.1.2-1 when the assigned Class 1E division is provided the test signal.

The Design Commitment for COL Appendix C ITAAC Number 2.1.02.07b (ITAAC Index Number 26) requires the Class 1E components identified in Table 2.1.2-1 to be powered from their respective Class 1E division. The Class 1E components in the table are valves, valve position displays and other instrumentation. In addition to the above discussed ITAAC verification that the Class 1E cables (within containment, the non-radiologically controlled area of the auxiliary building, and the radiologically controlled area of the auxiliary building, respectively) have been routed and terminated to the correct component from its assigned division according to the design, there are other ITAAC in Table 2.1.2-4 and other testing required prior to operation that also verify this aspect of the design as discussed below.

The Acceptance Criterion for ITAAC Index Number 26 includes verification that the component receives a divisional signal when one is provided. ITAAC Number 2.1.02.11.a.ii (ITAAC Index Number 47) requires that remotely operated valves (other than squib valves) perform their active functions from controls in the main control room. ITAAC Number 2.1.02.11.b.ii (ITAAC Index Number 47) requires that valves having PMS control perform an active safety function after receiving a signal from the PMS. If the valves are controlled by DAS, similar verifications include ITAAC Number 2.1.02.11.c.i (ITAAC Index Number 51) which requires that the squib valves receive a signal at the valve electrical leads, and ITAAC Number 2.1.02.11.c.ii (ITAAC Index Number 52) which requires remotely operated valves (other than squib valves) perform their active functions after receiving a signal from DAS.

For the instrumentation (including valve position displays), the Acceptance Criterion for ITAAC Number 2.1.02.11a.ii, Design Commitment 10 (ITAAC Index Number 47) verifies the safety-related displays identified in Table 2.1.2-1 can be retrieved in the main control room.

The RCS cold leg and hot leg narrow range temperature sensors identified in Table 2.1.2-1 are not directly called out in another ITAAC; however, they are used during hot functional testing (HFT), which is subject of other ITAAC such as RCS ITAAC Table 2.1.2-4 Design Commitment 9.a (ITAAC Index Number 41).

In addition to the ITAAC verifications, pre-operational testing (UFSAR Subsection 14.2.9.1.1) provides additional assurance that the components are tested and verified to perform satisfactorily before fuel load, and Technical Specification Surveillance Requirements verify operability of required components prior to operation in a mode in which the component could be needed for its safety functions.

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Therefore, the ITAAC Index Number 26 Design Commitment, which requires the Class 1E components identified in Table 2.1.2-1 to be powered from their respective Class 1E division, is preserved.

COL Appendix C ITAAC 2.1.03.09b, index number 83 (plant-specific Tier 1 Table 2.1.3-2, ITAAC No. 9.b) for the Reactor System (RXS) is an ITAAC that requires assigned division testing.

Table 2.1.3-2 Inspections, Tests, Analyses, and Acceptance Criteria		
Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
9.b) The Class 1E components identified in Table 2.1.3-1 are powered from their respective Class 1E division.	Testing will be performed by providing simulated test signals in each Class 1E division.	A simulated test signal exists for Class 1E equipment identified in Table 2.1.3-1 when the assigned Class 1E division is provided the test signal.

The Design Commitment for COL Appendix C ITAAC Number 2.1.02.09b (ITAAC Index Number 83) requires the Class 1E components identified in Table 2.1.3-1 to be powered from their respective Class 1E division. The Class 1E components in the table are instrumentation. In addition to the above discussed ITAAC verification that the Class 1E cables (within containment, the non-radiologically controlled area of the auxiliary building, and the radiologically controlled area of the auxiliary building, respectively) have been routed and terminated to the correct component from its assigned division according to the design, there are other ITAAC in Table 2.1.3-2 and other testing required prior to operation that also verify this aspect of the design as discussed below.

The Acceptance Criteria for ITAAC Index Number 83 includes verification that the component receives a divisional signal when one is provided. The Acceptance Criteria for ITAAC Number 2.5.02.06a.ii (ITAAC Index Number 530) includes testing of the source, intermediate, and power range detector cabling from the pre-amplifiers to PMS in order to verify that these components can generate reactor trip signals when required. The cabling from these detectors to the pre-amplifiers are tested during installation continuity testing and during initial startup testing per UFSAR Subsection 14.2.10.2.3 for source range and intermediate range detectors and per UFSAR Subsection 14.2.10.4.3 for intermediate range and power range detectors.

For the intermediate range detector display, the Acceptance Criterion for ITAAC Number 2.1.03.12 (ITAAC Index Number 87) verifies the safety-related displays identified in Table 2.1.3-1 can be retrieved in the main control room.

In addition to the ITAAC verifications, startup testing (UFSAR Subsections 14.2.10.1.3 and 14.2.10.1.4) provide additional verification that the source range components are tested prior to fuel load and verified to perform satisfactorily before fuel load, and Technical Specification Surveillance Requirements verify operability of source range, intermediate range, and power range detectors prior to operation in a mode in which the component could be needed for its safety functions.

Therefore, the ITAAC Index Number 83 Design Commitment, which requires the Class 1E components identified in Table 2.1.3-1 to be powered from their respective Class 1E division, is preserved.

COL Appendix C ITAAC 2.2.01.06b, index number 103 (plant-specific Tier 1 Table 2.2.1-3, ITAAC No. 6.b) for the Containment System (CNS) is an ITAAC that requires assigned division testing.

Table 2.2.1-3 Inspections, Tests, Analyses, and Acceptance Criteria		
Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
6.b) The Class 1E components identified in Table 2.2.1-1 are powered from their respective Class 1E division.	Testing will be performed by providing a simulated test signal in each Class 1E division.	A simulated test signal exists at the Class 1E equipment identified in Table 2.2.1-1 when the assigned Class 1E division is provided the test signal.

The Design Commitment for COL Appendix C ITAAC Number 2.2.01.06b (ITAAC Index Number 103) requires the Class 1E components identified in Table 2.2.1-1 to be powered from their respective Class 1E division. The Class 1E components in the table that are subject to this ITAAC are valves and valve position display instrumentation. In addition to the above discussed ITAAC verification that the Class 1E cables (within containment, the non-radiologically controlled area of the auxiliary building, and the radiologically controlled area of the auxiliary building, respectively) have been routed and terminated to the correct component from its assigned division according to the design, there are other ITAAC in Table 2.1.2-3 and other testing required prior to operation that also verify this aspect of the design as discussed below.

The Acceptance Criteria for ITAAC Index Number 103 includes verification that the component receives a divisional signal when one is provided. ITAAC Number 2.2.01.09, Design Commitment 10.a (ITAAC Index Number 110) requires that remotely operated valves perform their active functions from controls in the main control room. ITAAC Number 2.2.01.09, Design Commitment 10.b (ITAAC Index Number 110) requires that valves having PMS control perform an active safety function after receiving a signal from the PMS. If the valves are controlled by DAS, similar verifications include ITAAC Number 2.2.01.10.c (ITAAC Index Number 113) which requires remotely operated valves perform their active functions after receiving a signal from DAS.

For the valve position display instrumentation, the Acceptance Criterion for ITAAC Number 2.2.01.09, Design Commitment 9 (ITAAC Index Number 110) verifies the safety-related displays identified in Table 2.2.1-1 can be retrieved in the main control room.

The Class 1E electrical penetration assemblies (EPAs) in Table 2.2.1-1 are not powered components, but continuity through the EPA gets verified via the associated safety-related component tests.

In addition to the ITAAC verifications, pre-operational testing (UFSAR Subsection 14.2.9.1.10) provides additional assurance that the components are tested and verified to perform satisfactorily before fuel load, and Technical Specification Surveillance Requirements verify operability of required components prior to operation in a mode in which the component could be needed for its safety functions.

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Therefore, the ITAAC Index Number 103 Design Commitment, which requires the Class 1E components identified in Table 2.2.1-1 to be powered from their respective Class 1E division, is preserved.

COL Appendix C ITAAC 2.2.03.07b, index number 172 (plant-specific Tier 1 Table 2.2.3-4, ITAAC No. 7.b) for the Passive Core Cooling System (PXS) is an ITAAC that requires assigned division testing.

Table 2.2.3-4 Inspections, Tests, Analyses, and Acceptance Criteria		
Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
7.b) The Class 1E components identified in Table 2.2.3-1 are powered from their respective Class 1E division.	Testing will be performed by providing a simulated test signal in each Class 1E division.	A simulated test signal exists at the Class 1E equipment identified in Table 2.2.3-1 when the assigned Class 1E division is provided the test signal.

The Design Commitment for COL Appendix C ITAAC Number 2.2.03.07b (ITAAC Index Number 172) requires the Class 1E components identified in Table 2.2.3-1 to be powered from their respective Class 1E division. The Class 1E components in the table are valves, valve position displays and other instrumentation. In addition to the above discussed ITAAC verification that the Class 1E cables (within containment, the non-radiologically controlled area of the auxiliary building, and the radiologically controlled area of the auxiliary building, respectively) have been routed and terminated to the correct component from its assigned division according to the design, there are other ITAAC in Table 2.2.3-4 and other testing required prior to operation that also verify this aspect of the design as discussed below.

The Acceptance Criteria for ITAAC Index Number 172 includes verification that the component receives a divisional signal when one is provided. ITAAC Number 2.2.03.10, Design Commitment 11.a (ITAAC Index Number 206) requires that remotely operated valves (other than squib valves) perform their active functions from controls in the main control room. ITAAC Number 2.2.03. 10, Design Commitment 11.b (ITAAC Index Number 206) requires that valves (other than squib valves) having PMS control perform an active safety function after a signal is provided from the PMS. ITAAC Number 2.2.03.11.a.i (ITAAC Index Number 207) requires that controls from the main control room cause a signal at the squib valve electrical leads and ITAAC Number 2.2.03.11.b.i (ITAAC Index Number 209) requires that squib valves receive an electrical signal at the valve electrical leads after a signal is provided from the PMS. If the valves are controlled by DAS, similar verifications include ITAAC Number 2.2.03.11.c.i (ITAAC Index Number 212) which requires that the squib valves receive a signal at the valve electrical leads, and ITAAC Number 2.2.03.11.c.ii (ITAAC Index Number 213) which requires remotely operated valves (other than squib valves) perform their active functions after a signal is provided from DAS.

For the instrumentation (including valve position displays), the Acceptance Criterion for ITAAC Number 2.2.03.10, Design Commitment 10 (ITAAC Index Number 206) verifies the safety-related displays identified in Table 2.2.3-1 can be retrieved in the main control room.

In addition to the ITAAC verifications, pre-operational testing (UFSAR Subsection 14.2.9.1.3) provides additional assurance that the components are tested and verified to perform satisfactorily before fuel load, and Technical Specification Surveillance Requirements verify

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operability of required components prior to operation in a mode in which the component could be needed for its safety functions.

Therefore, the ITAAC Index Number 172 Design Commitment, which requires the Class 1E components identified in Table 2.2.3-1 to be powered from their respective Class 1E division, is preserved.

COL Appendix C ITAAC 2.2.04.07b, index number 233 (plant-specific Tier 1 Table 2.2.4-4, ITAAC No. 7.b) for the Steam Generator System (SGS) is an ITAAC that requires assigned division testing.

Table 2.2.4-4 Inspections, Tests, Analyses, and Acceptance Criteria		
Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
7.b) The Class 1E components identified in Table 2.2.4-1 are powered from their respective Class 1E division.	Testing will be performed by providing a simulated test signal in each Class 1E division.	A simulated test signal exists at the Class 1E equipment identified in Table 2.2.4-1 when the assigned Class 1E division is provided the test signal.

The Design Commitment for COL Appendix C ITAAC Number 2.2.04.07b (ITAAC Index Number 233) requires the Class 1E components identified in Table 2.2.4-1 to be powered from their respective Class 1E division. The Class 1E components in the table are valves, valve position displays and other instrumentation. In addition to the above discussed ITAAC verification that the Class 1E cables (within containment, the non-radiologically controlled area of the auxiliary building, and the radiologically controlled area of the auxiliary building, respectively) have been routed and terminated to the correct component from its assigned division according to the design, there are other ITAAC in Table 2.2.4-4 and other testing required prior to operation that also verify this aspect of the design as discussed below.

The Acceptance Criteria for ITAAC Index Number 233 includes verification that the component receives a divisional signal when one is provided. ITAAC Number 2.2.04.12a.iii, Design Commitment 9.a (ITAAC Index Number 250) requires that valves close after a signal is generated by the PMS. ITAAC Number 2.2.04.12a.iii, Design Commitment 11.a (ITAAC Index Number 250) requires that controls from the main control room cause the remotely operated valves perform their active functions after receiving a signal from PMS.

For the instrumentation (including valve position displays), the Acceptance Criterion for ITAAC Number 2.2.04.12a.iii, Design Commitment 10 (ITAAC Index Number 250) verifies the safety-related displays identified in Table 2.2.4-1 can be retrieved in the main control room.

In addition to the ITAAC verifications, pre-operational testing (UFSAR Subsection 14.2.9.1.2) provides additional assurance that the components are tested and verified to perform satisfactorily before fuel load, and Technical Specification Surveillance Requirements verify operability of required components prior to operation in a mode in which the component could be needed for its safety functions.

Therefore, the ITAAC Index Number 233 Design Commitment, which requires the Class 1E components identified in Table 2.2.4-1 to be powered from their respective Class 1E division, is preserved.

COL Appendix C ITAAC 2.2.05.06a, index number 263 (plant-specific Tier 1 Table 2.2.5-5, ITAAC No. 6.a) for the Main Control Room Emergency Habitability System (VES) is an ITAAC that requires assigned division testing.

Table 2.2.5-5 Inspections, Tests, Analyses, and Acceptance Criteria		
Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
6.a) The Class 1E components identified in Table 2.2.5-1 are powered from their respective Class 1E division.	Testing will be performed by providing a simulated test signal in each Class 1E division.	A simulated test signal exists at the Class 1E equipment identified in Table 2.2.5-1 when the assigned Class 1E division is provided the test signal.

The Design Commitment for COL Appendix C ITAAC Number 2.2.05.06a (ITAAC Index Number 263) requires the Class 1E components identified in Table 2.2.5-1 to be powered from their respective Class 1E division. The Class 1E components in the table are valves, load shed panels, displays and other instrumentation. In addition to the above discussed ITAAC verification that the Class 1E cables (within containment, the non-radiologically controlled area of the auxiliary building, and the radiologically controlled area of the auxiliary building, respectively) have been routed and terminated to the correct component from its assigned division according to the design, there are other ITAAC in Table 2.2.5-5 and other testing required prior to operation which also verify this aspect of the design as discussed below.

The Acceptance Criteria for ITAAC Index Number 263 includes verification that the component receives a divisional signal when one is provided. ITAAC Number 2.2.05.07a.i, Design Commitment 9.a (ITAAC Index Number 265) requires that remotely operated valves perform their active safety functions from controls in the main control room. ITAAC Number 2.2.05.07a.i, Design Commitment 9.b (ITAAC Index Number 265) requires that valves having PMS control perform an active safety function after receiving a signal from the PMS.

For the load shed panels, ITAAC Number 2.2.05.09c (ITAAC Index Number 877) provides the Acceptance Criteria that verifies the load shed panels identified in Table 2.2.5-1 perform their active safety function after receiving a signal from the PMS.

For the instrumentation (including displays), the Acceptance Criterion for ITAAC Number 2.2.05.07a.i, Design Commitment 8 (ITAAC Index Number 265) verifies the safety-related displays identified in Table 2.2.5-1 can be retrieved in the main control room.

In addition to the ITAAC verifications, pre-operational testing (UFSAR Subsection 14.2.9.1.6) provides additional assurance that the components are tested and verified to perform satisfactorily before fuel load, and Technical Specification Surveillance Requirements verify operability of required components prior to operation in a mode in which the component could be needed for its safety functions.

Therefore, the ITAAC Index Number 263 Design Commitment, which requires the Class 1E components identified in Table 2.2.5-1 to be powered from their respective Class 1E division, is preserved.

COL Appendix C ITAAC 2.3.02.06b, index number 296 (plant-specific Tier 1 Table 2.3.2-4, ITAAC No. 6.b) for the Chemical and Volume Control System (CVS) is an ITAAC that requires assigned division testing.

Table 2.3.2-4 Inspections, Tests, Analyses, and Acceptance Criteria		
Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
6.b) The Class 1E components identified in Table 2.3.2-1 are powered from their respective Class 1E division.	Testing will be performed on the CVS by providing a simulated test signal in each Class 1E division.	A simulated test signal exists at the Class 1E equipment identified in Table 2.3.2-1 when the assigned Class 1E division is provided the test signal.

The Design Commitment for COL Appendix C ITAAC Number 2.3.02.06b (ITAAC Index Number 296) requires the Class 1E components identified in Table 2.3.2-1 to be powered from their respective Class 1E division. The Class 1E components in the table are valves and valve position display instrumentation. In addition to the above discussed ITAAC verification that the Class 1E cables (within containment, the non-radiologically controlled area of the auxiliary building, and the radiologically controlled area of the auxiliary building, respectively) have been routed and terminated to the correct component from its assigned division according to the design, there are other ITAAC in Table 2.3.2-4 and other testing required prior to operation that also verify this aspect of the design as discussed below.

The Acceptance Criteria for ITAAC Index Number 296 includes verification that the component receives a divisional signal when one is provided. ITAAC Number 2.3.02.08a.i, Design Commitment 10.a (ITAAC Index Number 301) requires that remotely operated valves perform their active functions from controls in the main control room. ITAAC Number 2.3.02.08a.i, Design Commitment 10.b (ITAAC Index Number 301) requires that valves having PMS control perform an active function after receiving a signal from the PMS.

For the valve position display instrumentation, the Acceptance Criterion for ITAAC Number 2.3.02.08a.i, Design Commitment 9 (ITAAC Index Number 301) verifies the safety-related displays identified in Table 2.3.2-1 can be retrieved in the main control room.

In addition to the ITAAC verifications, pre-operational testing (UFSAR Subsection 14.2.9.1.5) provides additional assurance that the components are tested and verified to perform satisfactorily before fuel load, and Technical Specification Surveillance Requirements verify operability of required components prior to operation in a mode in which the component could be needed for its safety functions.

Therefore, the ITAAC Index Number 296 Design Commitment, which requires the Class 1E components identified in Table 2.3.2-1 to be powered from their respective Class 1E division, is preserved.

COL Appendix C ITAAC 2.3.06.07b, index number 368 (plant-specific Tier 1 Table 2.3.6-4, ITAAC No. 7.b) for the Normal Residual Heat Removal System (RNS) is an ITAAC that requires assigned division testing.

Table 2.3.6-4 Inspections, Tests, Analyses, and Acceptance Criteria		
Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
7.b) The Class 1E components identified in Table 2.3.6-1 are powered from their respective Class 1E division.	Testing will be performed on the RNS by providing a simulated test signal in each Class 1E division.	A simulated test signal exists at the Class 1E equipment identified in Table 2.3.6-1 when the assigned Class 1E division is provided the test signal.

The Design Commitment for COL Appendix C ITAAC Number 2.3.06.07.b (ITAAC Index Number 368) requires the Class 1E components identified in Table 2.3.6-1 to be powered from their respective Class 1E division. The Class 1E components in the table are valves and valve position display instrumentation. In addition to the above discussed ITAAC verification that the Class 1E cables (within containment, the non-radiologically controlled area of the auxiliary building, and the radiologically controlled area of the auxiliary building, respectively) have been routed and terminated to the correct component from its assigned division according to the design, there are other ITAAC in Table 2.3.6-4 and other testing required prior to operation that also verify this aspect of the design as discussed below.

The Acceptance Criteria for ITAAC Index Number 368 includes verification that the component receives a divisional signal when one is provided. ITAAC Number 2.3.06.11a, Design Commitment 11.a (ITAAC Index Number 382) requires that remotely operated valves perform their active functions from controls in the main control room. ITAAC Number 2.3.06.11a, Design Commitment 11.b (ITAAC Index Number 382) requires that valves having PMS control perform an active function after receiving a signal from the PMS.

For the valve position display instrumentation, the Acceptance Criterion for ITAAC Number 2.3.06.11a, Design Commitment 10 (ITAAC Index Number 382) verifies the safety-related displays identified in Table 2.3.2-1 can be retrieved in the main control room.

In addition to the ITAAC verifications, pre-operational testing (UFSAR Subsection 14.2.9.2.4) provides additional assurance that the components are tested and verified to perform satisfactorily before fuel load, and Technical Specification Surveillance Requirements verify operability of required components prior to operation in a mode in which the component could be needed for its safety functions.

Therefore, the ITAAC Index Number 368 Design Commitment, which requires the Class 1E components identified in Table 2.3.6-1 to be powered from their respective Class 1E division, is preserved.

COL Appendix C ITAAC 2.3.07.06a, index number 399 (plant-specific Tier 1 Table 2.3.7-4, ITAAC No. 6.a) for the Spent Fuel Pool Cooling System (SFS) is an ITAAC that requires assigned division testing.

Table 2.3.7-4 Inspections, Tests, Analyses, and Acceptance Criteria		
Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
6.a) The Class 1E components identified in Table 2.3.7-1 are powered from their respective Class 1E division.	Testing will be performed on the SFS by providing a simulated test signal in each Class 1E division.	A simulated test signal exists at the Class 1E components identified in Table 2.3.7-1 when the assigned Class 1E division is provided the test signal.

The Design Commitment for COL Appendix C ITAAC Number 2.3.07.06.a (ITAAC Index Number 399) requires the Class 1E components identified in Table 2.3.7-1 to be powered from their respective Class 1E division. The Class 1E components in the table are instrumentation. In addition to the above discussed ITAAC verification that the Class 1E cables (within containment, the non-radiologically controlled area of the auxiliary building, and the radiologically controlled area of the auxiliary building, respectively) have been routed and terminated to the correct component from its assigned division according to the design, there are other ITAAC in Table 2.3.7-4 and other testing required prior to operation that also verify this aspect of the design as discussed below.

The Acceptance Criteria for ITAAC Index Number 399 includes verification that the component receives a divisional signal when one is provided. For the instrumentation in the scope of ITAAC Index Number 399, ITAAC Number 2.3.07.07c, Design Commitment 9 (ITAAC Index Number 408) provides the Acceptance Criteria that verifies the safety-related displays identified in Table 2.3.7-1 can be retrieved in the main control room.

In addition to the ITAAC verifications, pre-operational testing (UFSAR Subsection 14.2.9.2.7) provides additional assurance that the components are tested and verified to perform satisfactorily before fuel load, and Technical Specification Surveillance Requirements verify operability of required components prior to operation in a mode in which the component could be needed for its safety functions.

Therefore, the ITAAC Index Number 399 Design Commitment, which requires the Class 1E components identified in Table 2.3.7-1 to be powered from their respective Class 1E division, is preserved.

COL Appendix C ITAAC 2.3.10.11a, index number 878 (plant-specific Tier 1 Table 2.3.10-4, ITAAC No. 11.a) for the Liquid Radwaste System (WLS) is an ITAAC that requires assigned division testing.

Table 2.3.10-4 Inspections, Tests, Analyses, and Acceptance Criteria		
Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
11.a) The Class 1E components identified in Table 2.3.10-1 are powered from their respective Class 1E division.	Testing will be performed on the WLS by providing a simulated test signal in each Class 1E division.	A simulated test signal exists at the Class 1E components identified in Table 2.3.10-1 when the assigned Class 1E division is provided the test signal.

The Design Commitment for COL Appendix C ITAAC Number 2.3.10.11.a (ITAAC Index Number 878) requires the Class 1E components identified in Table 2.3.10-1 to be powered from their respective Class 1E division. The Class 1E components in the table are instrumentation. In addition to the above discussed ITAAC verification that the Class 1E cables (within containment, the non-radiologically controlled area of the auxiliary building, and the radiologically controlled area of the auxiliary building, respectively) have been routed and terminated to the correct component from its assigned division according to the design, there are other ITAAC in Table 2.3.10-4 and other testing required prior to operation that also verify this aspect of the design as discussed below.

The Acceptance Criteria for ITAAC Index Number 878 includes verification that the component receives a divisional signal when one is provided. For the instrumentation in the scope of ITAAC Index Number 878, ITAAC Number 2.3.10.12 (ITAAC Index Number 879) provides the Acceptance Criteria that verifies the safety-related displays identified in Table 2.3.10-1 can be retrieved in the main control room.

In addition to the ITAAC verifications, pre-operational testing (UFSAR Subsection 14.2.9.3.1) provides additional assurance that the components are tested and verified to perform satisfactorily before fuel load, and Technical Specification Surveillance Requirements verify operability of required components prior to operation in a mode in which the component could be needed for its safety functions.

Therefore, the ITAAC Index Number 878 Design Commitment, which requires the Class 1E components identified in Table 2.3.10-1 to be powered from their respective Class 1E division, is preserved.

COL Appendix C ITAAC 2.3.13.06b, index number 467 (plant-specific Tier 1 Table 2.3.13-3, ITAAC No. 6.b) for the Primary Sampling System (PSS) is an ITAAC that requires assigned division testing.

Table 2.3.13-3 Inspections, Tests, Analyses, and Acceptance Criteria		
Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
6.b) The Class 1E components identified in Table 2.3.13-1 are powered from their respective Class 1E division.	Testing will be performed on the PSS by providing a simulated test signal in each Class 1E division.	A simulated test signal exists at the Class 1E equipment identified in Table 2.3.13-1 when the assigned Class 1E division is provided the test signal.

The Design Commitment for COL Appendix C ITAAC Number 2.3.13.06.b (ITAAC Index Number 467) requires the Class 1E components identified in Table 2.3.13-1 to be powered from their respective Class 1E division. The Class 1E components in the table are valves and valve position display instrumentation. In addition to the above discussed ITAAC verification that the Class 1E cables (within containment, the non-radiologically controlled area of the auxiliary building, and the radiologically controlled area of the auxiliary building, respectively) have been routed and terminated to the correct component from its assigned division according to the design, there are other ITAAC in Table 2.3.13-3 and other testing required prior to operation that also verify this aspect of the design as discussed below.

The Acceptance Criteria for ITAAC Index Number 467 includes verification that the component receives a divisional signal when one is provided. ITAAC Number 2.3.13.08, Design Commitment 10.a (ITAAC Index Number 470) requires that remotely operated valves perform their active functions from controls in the main control room. ITAAC Number 2.3.13.08, Design Commitment 10.b (ITAAC Index Number 470) requires that valves having PMS control perform an active function after receiving a signal from the PMS.

For the valve position display instrumentation, the Acceptance Criterion for ITAAC Number 2.3.13.08, Design Commitment 9 (ITAAC Index Number 470) verifies the safety-related displays identified in Table 2.3.13-1 can be retrieved in the main control room.

In addition to the ITAAC verifications, pre-operational testing (UFSAR Subsection 14.2.9.2.20) provides additional assurance that the components are tested and verified to perform satisfactorily before fuel load, and Technical Specification Surveillance Requirements verify operability of required components prior to operation in a mode in which the component could be needed for its safety functions.

Therefore, the ITAAC Index Number 467 Design Commitment, which requires the Class 1E components identified in Table 2.3.13-1 to be powered from their respective Class 1E division, is preserved.

COL Appendix C ITAAC 2.5.02.05a, index number 527 (plant-specific Tier 1 Table 2.5.2-8, ITAAC No. 5.a) for the Protection and Safety Monitoring System (PMS) is an ITAAC that requires assigned division testing.

Table 2.5.2-8 Inspections, Tests, Analyses, and Acceptance Criteria		
Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
5.a) The Class 1E equipment, identified in Table 2.5.2-1, is powered from its respective Class 1E division.	Tests will be performed by providing a simulated test signal in each Class 1E division.	A simulated test signal exists at the Class 1E equipment identified in Table 2.5.2-1 when the assigned Class 1E division is provided the test signal.

The Design Commitment for COL Appendix C ITAAC Number 2.5.02.05.a (ITAAC Index Number 527) requires the Class 1E equipment identified in Table 2.5.2-1 to be powered from their respective Class 1E division. The Class 1E equipment in the table is divisional PMS Cabinets, divisional reactor trip switchgear, the MCR/RSW transfer panels, divisional main control room safety-related displays and main control room safety-related controls. In addition to the above discussed ITAAC verification that the Class 1E cables (within containment, the non-radiologically controlled area of the auxiliary building, and the radiologically controlled area of the auxiliary building, respectively) have been routed and terminated to the correct component from its assigned division according to the design, there are other ITAAC in Table 2.5.2-8 and other testing required prior to operation that also verify this aspect of the design as discussed below.

The Acceptance Criteria for ITAAC Index Number 527 includes verification that the component receives a divisional signal when one is provided. ITAAC Number 2.5.02.06a.i (ITAAC Index Number 529) requires that the reactor trip switchgear opens after the test signal reaches the specified limits. ITAAC Number 2.5.02.06a.ii, Design Commitment 6.a (ITAAC Index Number 530) requires that PMS output signals to the reactor trip switchgear are generated after the test signal reaches the specified limit. ITAAC Number 2.5.02.06a.ii, Design Commitment 6.b (ITAAC Index Number 530) requires that PMS output signals to actuate the identified engineered safety features are generated after the test signal reaches the specified limit. ITAAC Number 2.5.02.06a.ii, Design Commitment 6.c (ITAAC Index Number 530) requires that PMS output signals for reactor trip and selected engineered safety features are generated after the test signal reaches the specified limit.

ITAAC Number 2.5.02.06a.ii, Design Commitment 9.b (ITAAC Index Number 530) requires that the PMS two-out-of-four initiation logic reverts to a two-out-of-three coincidence logic if one of the four channels is bypassed. ITAAC Number 2.5.02.06a.ii, Design Commitment 9.c (ITAAC Index Number 530) requires verification that a PMS channel cannot be bypassed if its redundant channel is already in bypass. ITAAC Number 2.5.02.08b.ii (ITAAC Index Number 543) requires testing to demonstrate the transfer of control capability from the main control room to the remote shutdown workstation.

ITAAC Number 2.5.02.06c.i (ITAAC Index Number 532) requires verification that the reactor trip switchgear opens after manual reactor trip controls are actuated.

Successful completion of these ITAAC requires appropriate divisional power and control.

In addition to the ITAAC verifications, pre-operational testing (UFSAR Subsection 14.2.9.1.12) provides additional assurance that the components are tested and verified to perform satisfactorily before fuel load, and Technical Specification Surveillance Requirements verify operability of required components prior to operation in a mode in which the component could be needed for its safety functions.

Therefore, the ITAAC Index Number 527 Design Commitment, which requires the Class 1E equipment identified in Table 2.5.2-1 to be powered from their respective Class 1E division, is preserved.

COL Appendix C ITAAC 2.6.01.03a, index number 582 (plant-specific Tier 1 Table 2.6.1-4, ITAAC No. 3.a) for the Main ac Power System (ECS) is an ITAAC that requires assigned division testing.

Table 2.6.1-4 Inspections, Tests, Analyses, and Acceptance Criteria		
Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
3.a) The Class 1E breaker control power for the equipment identified in Table 2.6.1-1 are powered from their respective Class 1E division.	Testing will be performed on the ECS by providing a simulated test signal in each Class 1E division.	A simulated test signal exists at the Class 1E equipment identified in Table 2.6.1-1 when the assigned Class 1E division is provided the test signal.

The Design Commitment for COL Appendix C ITAAC Number 2.6.01.04e (ITAAC Index Number 582) requires the Class 1E components identified in Table 2.6.1-1 to be powered from their respective Class 1E division. The Class 1E components in the table are circuit breakers and their display instrumentation. In addition to the above discussed ITAAC verification that the Class 1E cables (within containment, the non-radiologically controlled area of the auxiliary building, and the radiologically controlled area of the auxiliary building, respectively) have been routed and terminated to the correct component from its assigned division according to the design, there are other ITAAC in Table 2.6.1-4 and other testing required prior to operation that also verify this aspect of the design as discussed below.

The Acceptance Criterion for ITAAC Index Number 582 includes verification that the component receives a divisional signal when one is provided. The Acceptance Criterion for ITAAC Number 2.1.02.15 (ITAAC Index Number 67) verifies the displays (for breaker position) identified in Table 2.1.2-3 (which includes the circuit breakers identified in Table 2.6.1-1) can be retrieved in the main control room.

In addition to the ITAAC verifications, pre-operational testing (UFSAR Subsection 14.2.9.2.15) provides additional assurance that the components are tested and verified to perform satisfactorily before fuel load, and Technical Specification Surveillance Requirements verify operability of required components prior to operation in a mode in which the component could be needed for its safety functions.

Therefore, the ITAAC Index Number 582 Design Commitment, which requires the Class 1E components identified in Table 2.6.1-1 to be powered from their respective Class 1E division, is preserved.

COL Appendix C ITAAC 2.7.01.06a, index number 687 (plant-specific Tier 1 Table 2.7.1-4, ITAAC No. 6.a) for the Nuclear Island Nonradioactive Ventilation System (VBS) is an ITAAC that requires assigned division testing.

Table 2.7.1-4 Inspections, Tests, Analyses, and Acceptance Criteria		
Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
6.a) The Class 1E components identified in Table 2.7.1-1 are powered from their respective Class 1E division.	Testing will be performed on the VBS by providing a simulated test signal in each Class 1E division.	A simulated test signal exists at the Class 1E equipment identified in Table 2.7.1-1 when the assigned Class 1E division is provided the test signal.

The Design Commitment for COL Appendix C ITAAC Number 2.7.01.06a (ITAAC Index Number 687) requires the Class 1E components identified in Table 2.7.1-1 to be powered from their respective Class 1E division. The Class 1E components in the table are valves and valve position display instrumentation. In addition to the above discussed ITAAC verification that the Class 1E cables (within containment, the non-radiologically controlled area of the auxiliary building, and the radiologically controlled area of the auxiliary building, respectively) have been routed and terminated to the correct component from its assigned division according to the design, there are other ITAAC in Table 2.7.1-4 and other testing required prior to operation that also verify this aspect of the design as discussed below.

The Acceptance Criteria for ITAAC Index Number 687 includes verification that the component receives a divisional signal when one is provided. ITAAC Number 2.7.01.14, Design Commitment 10.a (ITAAC Index Number 700) requires that remotely operated valves perform their active functions from controls in the main control room. ITAAC Number 2.7.01.14, Design Commitment 10.b (ITAAC Index Number 700) requires that valves having PMS control perform an active safety function after receiving a signal from the PMS.

For the instrumentation, the Acceptance Criterion for ITAAC Number 2.7.01.14, Design Commitment 9 (ITAAC Index Number 700) verifies the safety-related displays identified in Table 2.7.1-1 can be retrieved in the main control room.

In addition to the ITAAC verifications, pre-operational testing (UFSAR Subsection 14.2.9.2.10) provides additional assurance that the components are tested and verified to perform satisfactorily before fuel load, and Technical Specification Surveillance Requirements verify operability of required components prior to operation in a mode in which the component could be needed for its safety functions.

Therefore, the ITAAC Index Number 687 Design Commitment, which requires the Class 1E components identified in Table 2.7.1-1 to be powered from their respective Class 1E division, is preserved.

Licensing Basis Change Descriptions

Each of the above identified ITAAC is proposed to be removed from the associated ITAAC table and replaced with “Not used per Amendment No. ###.” The ### is a placeholder for the COL Amendment number assigned by the NRC upon approval of LAR-22-003.

Category b – Consolidation of Electrical ITAAC

COL Appendix C, Section 3.3 provides design descriptions for AP1000 structural buildings. The Nuclear Island (NI) structures, which include the containment and the auxiliary building, are described in Section 3.3. The design descriptions for the containment and the auxiliary building include electrical separation criteria, identified as:

- a) Class 1E electrical cables, communication cables associated with only one division, and raceways that route the Class 1E electrical cables and the communication cables are identified according to applicable color-coded Class 1E divisions.
- b) Class 1E divisional electrical cables and communication cables associated with only one division are routed in their respective divisional raceways.
- c) Separation is maintained between Class 1E divisions in accordance with the fire areas as identified in Table 3.3-3.
- d) Physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.
- e) Class 1E communication cables which interconnect two divisions are routed and separated such that the Protection and Safety Monitoring System voting logic is not defeated by the loss of any single raceway or fire area.

Items a), b) and d) are readily verifiable with a single inspection and associated documentation. As such these are proposed to be consolidated for the respective areas of inside containment (ITAAC 789, 792, 800, 803, 806, and 809), the non-radiologically controlled area of the auxiliary building (ITAAC 790, 793, 801, 804, 807, and 810), and the radiologically controlled area of the auxiliary building (ITAAC 791, 794, 802, 805, 808, and 811).

The first ITAAC of each of these sets requires verification that the Class 1E electrical cables, communication cables associated with only one division, and raceways that route the Class 1E electrical cables and the communication cables are identified by the appropriate color code. The second ITAAC of each these sets requires verification that Class 1E electrical cables and communication cables associated with only one division are routed in raceways assigned to the same division, and that there are no other safety division electrical cables in a raceway assigned to a different division.

The third ITAAC of each of these sets requires verification of vertical and horizontal separation of raceways, while the fourth, fifth, and sixth ITAAC of each set provide alternatives for separation that does not meet the criteria in the separation ITAAC. These alternatives include

a) running the circuits in enclosed raceways or providing barriers, b) analyzing the separation distances less than those specified and not provided with enclosed raceways or barriers, or c) treat the non-Class 1E wiring as Class 1E wiring (i.e., an associated circuit) when the minimum separation distance is not met, and neither a barrier nor analysis is provided.

As previously noted, these ITAAC rely on the same set of documentation (i.e., cable installation QCIRs, cable termination QCIRs, and raceway installation QCIRs) and contain the same scope (i.e., Class 1E cables and raceways that route them in the areas specified). As one set of documentation can readily close these sets of ITAAC, they are requested to be combined as shown in the markups.

One inconsequential edit was determined to be necessary in the numbering of the acceptance criterion for VEGP Unit 4 COL Appendix C ITAAC No. 805, ITAAC Table 3.3-6, item 7.d, currently shows the acceptance criterion as “ii.c)” while it should be “iii.c)” as shown in the plant-specific Tier 1 information for VEGP Units 3 and 4 and in the Unit 3 COL Appendix C ITAAC No. 805 for ITAAC Table 3.3-6, item 7.d. This numbering is proposed to be editorially revised in the consolidated ITAAC No. 802.

Consolidation will minimize the number of ITAAC without eliminating or reducing scope of ITAAC; therefore, consolidation of these electrical separation ITAAC:

- Does not reduce the scope of ITA that are required to be performed,
- Does not eliminate the need to perform the required ITA for each impacted system, and
- Does not impact the scope of the 10 CFR 52.103(g) finding to be made by the Commission, indicating that the AC in COL Appendix C are met.

Licensing Basis Change Descriptions

ITAAC 789, 792, 803, 806, and 809 are proposed to be consolidated into existing ITAAC 800. In the plant-specific Tier 1 document these are identified in Table 3.3-6 as ITAAC Design Commitment 7.a Acceptance Criterion a, ITAAC Design Commitment 7.b Acceptance Criterion a, ITAAC Design Commitment 7.d Acceptance Criterion iii.a, ITAAC Design Commitment 7.d Acceptance Criterion iv.a, and ITAAC Design Commitment 7.d Acceptance Criterion v.a, to be incorporated into ITAAC Design Commitment 7.d with its existing Acceptance Criteria ii.a related to electrical equipment routing inside containment.

ITAAC 790, 793, 804, 807, and 810 are proposed to be consolidated into existing ITAAC 801. In the plant-specific Tier 1 document these are identified in Table 3.3-6 as ITAAC Design Commitment 7.a Acceptance Criterion b, ITAAC Design Commitment 7.b Acceptance Criterion b, ITAAC Design Commitment 7.d Acceptance Criterion iii.b, ITAAC Design Commitment 7.d Acceptance Criterion iv.b, and ITAAC Design Commitment 7.d Acceptance Criterion v.b, to be incorporated into ITAAC Design Commitment 7.d with its existing Acceptance Criteria ii.c related to electrical equipment routing within the non-radiologically controlled area of the auxiliary building.

ITAAC 791, 794, 805, 808, and 811 are proposed to be consolidated into existing ITAAC 802. In the plant-specific Tier 1 document these are identified in Table 3.3-6 as ITAAC Design Commitment 7.a Acceptance Criterion c, ITAAC Design Commitment 7.b Acceptance Criterion c, ITAAC Design Commitment 7.d Acceptance Criterion iii.c, ITAAC Design Commitment 7.d Acceptance Criterion iv.c, and ITAAC Design Commitment 7.d Acceptance Criterion v.c, to be incorporated into ITAAC Design Commitment 7.d with its existing Acceptance Criteria ii.c related to electrical equipment routing within the radiologically controlled area of the auxiliary building.

Supporting Technical Details

Review of the closure of the VEGP Unit 3 ITAAC has resulted in SNC lessons learned and identification of potential changes to the Tier 1 information that would increase efficiency of closure of the associated Unit 4 ITAAC. These lessons have led to the proposed changes identified above.

The ITAAC described above are requested to be eliminated (Category a) and consolidated (Category b) because the actions and documentation required to complete the AC for these ITAAC are duplicative of other ITAAC (i.e., electrical ITAAC) and the ICNs would contain the same documentation. Thus, submittal of ICNs based upon the current COL Appendix C (and plant-specific Tier 1) information creates additional regulatory burden on the Licensee and the NRC staff. In addition, elimination and consolidation of redundant ITAAC reduces redundant documentation by reducing the number of ICNs and associated processing of documentation in accordance with the Paperwork Reduction Act of 1980.

The proposed ITAAC elimination and consolidation continues to meet the intent of 10 CFR Part 52 Appendix D and COL Appendix C (and plant-specific Tier 1) design descriptions, tables, and figures and 10 CFR 52.99 for ITAAC closure notification and completion. The ITAAC optimization also does not make technical changes to the COL Appendix C (and plant-specific Tier 1) design descriptions, tables, and figures, because no SSC design function or analysis described in the UFSAR is being affected, no defense-in-depth safety function is affected, and no plant-specific ITAAC is technically changed.

COL Appendix C (and plant-specific Tier 1) information is comprised of the design information and functions subject to verification by the ITAAC closure process. The proposed changes neither affect the ability to meet design criteria or functions nor involve a decrease in the safety provided by the associated systems. COL Appendix C (and plant-specific Tier 1) ITAAC information would continue to adequately validate their corresponding UFSAR (Tier 2) design commitments. The proposed changes do not impact an SSC, function or feature used in the prevention or mitigation of accidents or their safety/design analyses. The changes do not affect any SSC accident initiator or initiating sequence of events or involve any safety-related SSC or function used to mitigate an accident.

The proposed changes do not involve a change to a fission product barrier. The changes do not result in a new failure mode, malfunction or sequence of events that could affect safety. The changes would not allow for a new fission product release path, result in a new fission

product barrier failure mode, or create a new sequence of events that would result in significant fuel cladding failures.

The proposed changes do not affect any safety-related equipment, design code limit, safety-related function, safety-related design analysis, safety analysis input or result, or design or safety margin. No safety analysis or design basis acceptance limit or criterion would be challenged or exceeded.

The proposed changes do not involve a technical (design, analysis, function, or qualification) change, e.g., there is no change to an associated calculation, design parameter or design requirement. Therefore, the changes would not result in a decrease in plant safety. The proposed changes associated with this license amendment request do not affect the containment, control, channeling, monitoring, processing or releasing of radioactive and non-radioactive materials. No effluent release path is involved. The types and quantities of expected effluents are not changed; therefore, radioactive or non-radioactive material effluents should not be affected. Plant radiation zones (as described in UFSAR Section 12.3), controls under 10 CFR 20, and expected amounts and types of radioactive materials are not affected by the proposed changes. Therefore, individual and cumulative radiation exposures will not change.

UFSAR Chapter 14, Section 14.3, and NUREG-0800, Standard Review Plan (SRP), Section 14.3, define and describe requirements for ITAAC. Specifically, they identify that the purpose of the ITAAC is to verify that an as-built facility conforms to the approved plant design and applicable regulations. UFSAR Subsection 14.3.2.1 describes the selection criteria for certified design descriptions and ITAAC. The changes proposed by this request do not lessen the degree of conformity nor reduce the scope of the ITAAC as required by the UFSAR or the SRP, because the consolidated and redundant electrical ITAAC continue to meet the ITAAC selection criteria and provide verification that the as-built facility conforms to the approved plant design and applicable regulations.

Summary

The change consolidates a number of ITAAC in COL Appendix C (and plant-specific Tier 1) ITAAC Tables by relocating or removing multiple entries in order to minimize the number of ITAAC completion packages and ICNs. The above-mentioned licensing basis changes will also result in a change to the COL Appendix C (and corresponding plant-specific Tier 1) table of contents. These changes are considered administrative in nature since no technical changes are being made, the required inspections, tests and analyses are still being performed, and the margin of safety is not reduced.

3. TECHNICAL EVALUATION (Included in Section 2)

4. REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

10 CFR 52.98(c) requires NRC approval for any modification to, addition to, or deletion from the terms and conditions of a Combined License (COL). This activity involves a departure from COL Appendix C information, and a corresponding change to plant-specific Tier 1 information; therefore, this activity requires an amendment to the COL. Accordingly, NRC approval is required prior to making the plant-specific changes in this license amendment request.

4.2 Precedent

Previous VEGP license amendment request (LAR) 17-006 and its supplement, LAR-19-002, LAR-19-005, and LAR-19-007, provide precedents for this request as they requested similar ITAAC revisions. LAR-17-006 was approved as VEGP Units 3 and 4 Amendment Nos. 85 and 84, respectively [ML17216A064]. LAR-19-002 was approved as VEGP Units 3 and 4 Amendment Nos. 170 and 168, respectively [ML19337A667]. LAR-19-005 was approved as VEGP Units 3 and 4 Amendment Nos. 167 and 165, respectively [ML19164A263]. LAR-19-007 was approved as VEGP Units 3 and 4 Amendment Nos. 163 and 161, respectively [ML19213A288].

4.3 Significant Hazards Consideration Determination

The proposed changes would require non-technical changes to COL Appendix C information. These changes consolidate and relocate Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) and subsume redundant Inspections, Tests and Analyses (ITA) and Acceptance Criteria (AC) to improve efficiency of the ITAAC completion and closure process.

An evaluation to determine whether or not a significant hazards consideration is involved with the proposed amendment was completed by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

4.3.1 Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed non-technical change to Combined License (COL) Appendix C will consolidate, relocate and subsume redundant ITAAC in order to improve and create a more efficient process for the ITAAC Closure Notification submittals. No structure, system, or component (SSC) design or function is affected. No design or safety analysis is affected. The proposed changes do not affect any accident initiating event or component failure, thus the probabilities of the accidents previously evaluated are not affected. No function used to mitigate a radioactive

material release and no radioactive material release source term is involved, thus the radiological releases in the accident analyses are not affected.

Therefore, the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

4.3.2 Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed change to COL Appendix C does not affect the design or function of any SSC, but will consolidate, relocate and subsume redundant ITAAC in order to improve efficiency of the ITAAC completion and closure process. The proposed changes would not introduce a new failure mode, fault or sequence of events that could result in a radioactive material release.

Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

4.3.3 Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No

The proposed change to COL Appendix C to consolidate, relocate and subsume redundant ITAAC in order to improve efficiency of the ITAAC completion and closure process is considered non-technical and would not affect any design parameter, function or analysis. There would be no change to an existing design basis, design function, regulatory criterion, or analysis. No safety analysis or design basis acceptance limit/criterion is involved.

Therefore, the proposed amendment does not involve a significant reduction in a margin of safety.

Based on the above, it is concluded that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

4.4 Conclusions

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public. Pursuant to 10 CFR 50.92, the requested change does not involve a Significant Hazards Consideration Determination.

5. ENVIRONMENTAL CONSIDERATIONS

The proposed changes would require non-technical changes to COL Appendix C information. The changes consolidate and relocate Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) and subsume redundant Inspections, Tests and Analyses (ITA) and Acceptance Criteria (AC) to improve efficiency of the ITAAC completion and closure process.

A review has determined that the anticipated construction and operational effects of the proposed amendment meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9), in that:

- (i) *There is no significant hazards consideration.*

As documented in Section 4.3, Significant Hazards Consideration Determination, of this license amendment request, an evaluation was completed to determine whether or not a significant hazards consideration is involved by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment." The Significant Hazards Consideration Determination determined that (1) the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated; (2) the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated; and (3) the proposed amendment does not involve a significant reduction in a margin of safety. Therefore, it is concluded that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and accordingly, a finding of "no significant hazards consideration" is justified.

- (ii) *There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite.*

The proposed change to COL Appendix C is to consolidate, relocate and subsume redundant ITAAC in order to create a more efficient process for the associated ITAAC Closure Notification submittals. The proposed changes are unrelated to any aspect of plant construction or operation that would introduce any change to effluent types (e.g., effluents containing chemicals or biocides, sanitary system effluents, and other effluents), or affect any plant radiological or non-radiological effluent release quantities. Furthermore, the proposed changes do not affect any effluent release path or diminish the functionality of any design or operational features that are credited with controlling the release of effluents during plant operation. Therefore, it is concluded that the proposed amendment does not involve a significant change in the types or a significant increase in the amounts of any effluents that may be released offsite.

- (iii) *There is no significant increase in individual or cumulative occupational radiation exposure.*

The proposed change to COL Appendix C is to consolidate, relocate and subsume redundant ITAAC in order to create a more efficient process for the associated ITAAC Closure Notification submittals. Plant radiation zones (addressed in UFSAR Section 12.3) are not affected, and controls under 10 CFR 20 preclude a significant increase in occupational radiation exposure. Therefore, the proposed amendment does not involve a significant increase in individual or cumulative occupational radiation exposure.

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Enclosure 1 - Request for License Amendment: Electrical Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Optimization (LAR-22-003)

Based on the above review of the proposed amendment, it has been determined that anticipated construction and operational impacts of the proposed amendment do not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in the individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), an environmental impact statement or environmental assessment of the proposed exemption is not required.

Southern Nuclear Operating Company

ND-22-0709

Enclosure 2

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

Exemption Request:

Electrical Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Optimization

(LAR-22-003)

(This Enclosure consists of 8 pages, including this cover page.)

1.0 Purpose

Southern Nuclear Operating Company (SNC), the Licensee, requests a permanent exemption from the provisions of 10 CFR 52, Appendix D, Section III.B, "Design Certification Rule for the AP1000 Design, Scope and Contents," to allow a departure from elements of the certified information in Tier 1 of the generic AP1000 Design Control Document (DCD). The regulation, 10 CFR 52, Appendix D, Section III.B, requires an applicant or licensee referencing Appendix D to 10 CFR Part 52 to incorporate by reference and comply with the requirements of Appendix D, including certification information in DCD Tier 1. Tier 1 includes ITAAC that must be satisfactorily performed prior to fuel load. The design details to be verified by these ITAAC are specified in the text, tables, and figures that are referenced in each individual ITAAC. The generic Tier 1 information from which an exemption is requested includes the plant-specific Tier 1 information, described below, for two categories of changes.

Category a) – "Assigned Division" ITAAC

The following plant-specific ITAAC items are proposed to be identified as "Not Used per Amendment No. ###" in the identified plant-specific Tier 1 tables, as shown in Enclosure 3 of this letter:

- Tier 1 Table 2.1.2-4, ITAAC Item 7.b
- Tier 1 Table 2.1.3-2, ITAAC Item 9.b
- Tier 1 Table 2.2.1-3, ITAAC Item 6.b
- Tier 1 Table 2.2.3-4, ITAAC Item 7.b
- Tier 1 Table 2.2.4-4, ITAAC Item 7.b
- Tier 1 Table 2.2.5-5, ITAAC Item 6.a
- Tier 1 Table 2.3.2-4, ITAAC Item 6.b
- Tier 1 Table 2.3.6-4, ITAAC Item 7.b
- Tier 1 Table 2.3.7-4, ITAAC Item 6.a
- Tier 1 Table 2.3.10-4, ITAAC Item 11.a
- Tier 1 Table 2.3.13-3, ITAAC Item 6.b
- Tier 1 Table 2.5.2-8, ITAAC Item 5.a
- Tier 1 Table 2.6.1-4, ITAAC Item 3.a
- Tier 1 Table 2.7.1-4, ITAAC Item 6.a

Category b – Consolidation of Electrical ITAAC

The plant-specific Tier 1 information is proposed to be revised by consolidating the Design Commitments, Inspections, Tests, Analyses, and Acceptance Criteria for the following plant-specific ITAAC items, as described below and as shown in Enclosure 3 of this letter. The consolidation relocates and combines the following ITAAC into a single ITAAC. The Design Commitments, Inspections, Tests, Analyses, and Acceptance Criteria remain unchanged.

- Tier 1 Table 3.3-6, Items 7.a, 7.b, and 7.d, for inside containment are consolidated in one ITAAC.

- Tier 1 Table 3.3-6, Items 7.a, 7.b, and 7.d, for the non-radiologically controlled area of the auxiliary building are consolidated in one ITAAC.
- Tier 1 Table 3.3-6, Items 7.a, 7.b, and 7.d, for the radiologically controlled area of the auxiliary building are consolidated in one ITAAC.

Other – Non-Impact for Unit 3

A single plant-specific Tier 1 document is maintained for both VEGP Units 3 and 4. However, since VEGP Unit 3 has already completed the ITAAC and the NRC has issued their confirmation of the completion in accordance with 10 CFR 52.103(g), the ITAAC are no longer requirements for VEGP Unit 3. Since the proposed changes impact only the ITAAC tables, a single plant-specific Tier 1 document can continue to be maintained for both VEGP Units 3 and 4 with no impact to Unit 3 requirements.

Summary

This request for exemption provides the technical and regulatory basis to demonstrate that 10 CFR 52.63, §52.7, and §50.12 requirements are met and will apply the requirements of 10 CFR 52, Appendix D, Section VIII.A.4 to allow departures from generic Tier 1 information due to proposed consolidation, relocation and elimination of VEGP Unit 4 ITAAC.

2.0 Background

The Licensee is the holder of Combined License No. NPF-92, which authorizes construction and operation of the Westinghouse Electric Company AP1000 nuclear plant, named Vogtle Electric Generating Plant (VEGP) Unit 4. The proposed changes would consolidate and relocate ITAAC and subsume redundant Inspections, Tests and Analyses (ITA) and Acceptance Criteria (AC) throughout the VEGP Unit 4 plant-specific Tier 1 information.

During preparation and submittal of ITAAC Closure Notifications (ICNs) for VEGP Unit 3, SNC identified potential additional efficiencies to the ICN submittal process. Submittal of the corresponding VEGP Unit 4 ICNs based upon the current plant-specific Tier 1 information creates additional regulatory burden on the Licensee and the NRC staff. The identified efficiencies would consolidate and relocate ITAAC and subsume redundant ITA and AC to improve efficiency of the ITAAC completion and closure process. This activity requests exemption from the Generic DCD Tier 1 tables that support the associated COL Appendix C ITAAC.

An exemption from elements of the AP1000 certified (Tier 1) design information is requested to allow plant-specific departures to be taken from the VEGP Unit 4 Tier 1 ITAAC Tables listed in Section 1.0 of this Enclosure.

3.0 Technical Justification of Acceptability

An exemption is requested to depart from AP1000 Generic DCD Tier 1 material by consolidating and relocating VEGP Unit 4 ITAAC and subsuming redundant ITA and AC. Consolidation, relocation, and subsumption of redundant ITAAC avoids redundant documentation by reducing the number of ICNs because redundant documentation is not

submitted. The proposed ITAAC optimization continues to meet the intent of 10 CFR Part 52 Appendix D and plant-specific Tier 1 design descriptions, tables, and figures. The proposed exemption would allow a change to the plant-specific Tier 1 ITAAC information consistent with existing plant-specific DCD Tier 2 information.

The proposed changes neither adversely impact the ability to meet the design functions of the SSCs nor involve a significant decrease in the level of safety provided by the structures, systems, or components. Because the proposed optimizations are consistent with plant-specific DCD Tier 2 information and the approved design, the changes do not affect a structure, system, or component. The proposed changes to information in plant-specific DCD Tier 1 continue to provide the detail necessary to implement the corresponding ITAAC.

Detailed technical justification supporting this request for exemption is provided in Section 2 of the associated License Amendment Request in Enclosure 1 of this letter.

4.0 Justification of Exemption

10 CFR 52, Appendix D, Section VIII.A.4, 10 CFR 52.63(b)(1), and 52.98(f) govern the issuance of exemptions from elements of the certified design information for AP1000 nuclear power plants. SNC has identified changes to the VEGP Unit 4 Tier 1 information as a result of lessons learned during the closure of the VEGP Unit 3 ITAAC. Thus, an exemption to the certified design information in the VEGP Unit 4 Tier 1 is needed.

10 CFR 52, Appendix D, and 10 CFR 50.12, §52.7, and §52.63 state that the NRC may grant exemptions from the requirements of the regulations provided six conditions are met: 1) the exemption is authorized by law [§50.12(a)(1)]; 2) the exemption will not present an undue risk to the health and safety of the public [§50.12(a)(1)]; 3) the exemption is consistent with the common defense and security [§50.12(a)(1)]; 4) special circumstances are present [§50.12(a)(2)(ii)]; 5) the special circumstances outweigh any decrease in safety that may result from the reduction in standardization caused by the exemption [§52.63(b)(1)]; and 6) the design change will not result in a significant decrease in the level of safety [Part 52, App. D, VIII.A.4].

The requested exemption satisfies the criteria for granting specific exemptions, as described below.

1. This exemption is authorized by law

The NRC has authority under 10 CFR 52.63, §52.7, and §50.12 to grant exemptions from the requirements of NRC regulations. Specifically, 10 CFR 50.12 and §52.7 state that the NRC may grant exemptions from the requirements of 10 CFR Part 52 upon a proper showing. No law exists that would preclude the changes covered by this exemption request. Additionally, granting of the proposed exemption does not result in a violation of the Atomic Energy Act of 1954, as amended, or the Commission's regulations.

Accordingly, this requested exemption is "authorized by law," as required by 10 CFR 50.12(a)(1).

2. This exemption will not present an undue risk to the health and safety of the public

The proposed exemption from the requirements of 10 CFR 52, Appendix D, Section III.B, would allow changes to elements of the plant-specific DCD Tier 1 to depart from the AP1000 certified (Tier 1) design information. The plant-specific DCD Tier 1 will continue to reflect the approved licensing basis for VEGP Units 3 and 4 and will maintain a consistent level of detail with that which is currently provided elsewhere in Tier 1 of the DCD. Therefore, the affected plant-specific DCD Tier 1 ITAAC will continue to serve its required purpose.

These changes will not impact the ability of the SSCs to perform their design functions. Because the changes will not alter the design, construction, or operation of any plant equipment or systems, these changes do not present an undue risk to existing equipment or systems. These changes do not add any new equipment or system interfaces to the current plant design. The description changes do not introduce any new industrial, chemical, or radiological hazards that would represent a public health or safety risk, nor do they modify or remove any design or operational controls or safeguards that are intended to mitigate any existing on-site hazards. Furthermore, the proposed changes would not allow for a new fission product release path, result in a new fission product barrier failure mode, or create a new sequence of events that would result in significant fuel cladding failures. Accordingly, these changes do not present an undue risk from any new equipment or systems.

Therefore, the requested exemption from 10 CFR 52, Appendix D, Section III.B, would not present an undue risk to the health and safety of the public.

3. The exemption is consistent with the common defense and security

The requested exemption from the requirements of 10 CFR 52, Appendix D, Section III.B, would allow the Licensee to depart from elements of the plant-specific DCD Tier 1 ITAAC information. The requested exemption does not alter the design, function, or operation of any structure or plant equipment that is necessary to maintain a safe and secure status of the plant. The requested exemption has no impact on plant security or safeguards procedures.

Therefore, the requested exemption is consistent with the common defense and security.

4. Special circumstances are present

10 CFR 50.12(a)(2) lists six "special circumstances" for which an exemption may be granted. Pursuant to the regulation, it is necessary for one of these special circumstances to be present in order for the NRC to consider granting an exemption request. The requested exemption meets the special circumstances of 10 CFR 50.12(a)(2)(ii). That subsection defines special circumstances as when "Application of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule."

The rule under consideration in this request for exemption is 10 CFR 52, Appendix D, Section III.B, which requires that a licensee referencing the AP1000 Design Certification Rule (10 CFR Part 52, Appendix D) shall incorporate by reference and comply with the

requirements of Appendix D, including Tier 1 information. The VEGP Units 3 and 4 COLs reference the AP1000 Design Certification Rule and incorporate by reference the requirements of 10 CFR Part 52, Appendix D, including Tier 1 information. The underlying purpose of Appendix D, Section III.B, is to describe and define the scope and contents of the AP1000 design certification, and to require compliance with the design certification information in Appendix D.

The proposed changes to consolidate and relocate ITAAC and subsume redundant ITA and AC maintain the design functions of the systems. This change does not impact the ability of any SSCs to perform their functions or negatively impact safety. Accordingly, this exemption from the certification information will enable the licensee to safely construct and operate the AP1000 facility consistent with the design certified by the NRC in 10 CFR 52, Appendix D.

Therefore, special circumstances are present, because application of the current generic certified design information in Tier 1 as required by 10 CFR Part 52, Appendix D, Section III.B, in the particular circumstances discussed in this request is not necessary to achieve the underlying purpose of the rule.

5. The special circumstances outweigh any decrease in safety that may result from the reduction in standardization caused by the exemption

Based on the nature of the changes to the plant-specific Tier 1 information in this area and the understanding that these changes are not related to system functions, these changes will not have a negative impact. Nevertheless, if other AP1000 licensees do not elect to request this exemption, the special circumstances continue to outweigh any decrease in safety from the reduction in standardization because the key design functions associated with this request will continue to be maintained. This exemption request and the associated marked-up table demonstrate that there is a minimal change from the generic AP1000 DCD, minimizing the reduction in standardization and, consequently, the safety impact from the reduction.

Therefore, the special circumstances associated with the requested exemption outweigh any decrease in safety that may result from the reduction in standardization caused by the exemption.

6. The design change will not result in a significant decrease in the level of safety

The proposed exemption would allow changes to consolidate and relocate ITAAC and subsume redundant ITA and AC in plant-specific Tier 1. The optimization will not impact the functional capabilities of the components identified in the affected ITAAC. Because the optimization of ITAAC associated with this exemption request will not modify the design, construction, or operation of any systems or equipment, there are no new failure modes introduced by these changes and the level of safety provided by the current structures, systems, and components will be unchanged.

Because the proposed changes to the ITAAC will not adversely affect the ability of the structures, systems or components to perform their design functions and the level of safety provided by the structures, systems, and components is unchanged, it is concluded that the changes associated with proposed exemption will not result in a significant decrease in the level of safety.

5.0 RISK ASSESSMENT

A risk assessment was not determined to be applicable to address the acceptability of this proposal.

6.0 PRECEDENT

Previous VEGP license amendment request (LAR) 17-006 and its supplement, LAR-19-002, LAR-19-005, and LAR-19-007, provide precedents for this request as they requested similar ITAAC revisions. LAR-17-006 was approved as VEGP Units 3 and 4 Amendment Nos. 85 and 84, respectively [ML17216A064]. LAR-19-002 was approved as VEGP Units 3 and 4 Amendment Nos. 170 and 168, respectively [ML19337A667]. LAR-19-005 was approved as VEGP Units 3 and 4 Amendment Nos. 167 and 165, respectively [ML19164A263]. LAR-19-007 was approved as VEGP Units 3 and 4 Amendment Nos. 163 and 161, respectively [ML19213A288].

7.0 ENVIRONMENTAL CONSIDERATION

The Licensee requests a departure from elements of the certified information in Tier 1 of the generic AP1000 DCD. The Licensee has determined that the proposed departure would require a permanent exemption from the requirements of 10 CFR 52, Appendix D, Section III.B, Design Certification Rule for the AP1000 Design, Scope and Contents, with respect to installation or use of facility components located within the restricted area, as defined in 10 CFR Part 20, or which changes an inspection or a surveillance requirement; however, the Licensee evaluation of the proposed exemption has determined that the proposed exemption meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9).

Based on the above review of the proposed exemption, the Licensee has determined that the proposed activity does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in the individual or cumulative occupational radiation exposure. Accordingly, the proposed exemption meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), an environmental impact statement or environmental assessment of the proposed exemption is not required.

Specific details of the environmental considerations supporting this request for exemption are provided in Section 5 of the associated License Amendment Request provided in Enclosure 1 of this letter.

8.0 CONCLUSION

The proposed changes to Tier 1 are necessary to consolidate information in ITAAC Tables in plant-specific DCD Tier 1 to improve efficiency of the ITAAC completion and closure

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Enclosure 2 - Exemption Request: Electrical Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Optimization (LAR-22-003)

process. The exemption request meets the requirements of 10 CFR 52.63, "Finality of Design Certifications," 10 CFR 52.7, "Specific Exemptions," 10 CFR 50.12, "Specific Exemptions," and 10 CFR 52 Appendix D, "Design Certification Rule for the AP1000." Specifically, the exemption request meets the criteria of 10 CFR 50.12(a)(1) in that the request is authorized by law, presents no undue risk to public health and safety, and is consistent with the common defense and security. Furthermore, approval of this request does not result in a significant decrease in the level of safety, satisfies the underlying purpose of the AP1000 Design Certification Rule, and does not present a significant decrease in safety as a result of a reduction in standardization.

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Enclosure 3

Vogtle Electric Generating Plant (VEGP) Units 3 and 4

Proposed Changes to the Licensing Basis Documents

(LAR-22-003)

Note:

Added text is shown as Blue Underline

Deleted text is shown as ~~Red Strikethrough~~

Relocated text is shown as Green Underline or ~~Strikethrough~~

* * * indicates omitted existing text that is not shown and is not revised.

(This Enclosure consists of 25 pages, including this cover page.)

The COL Appendix C changes presented in this enclosure will also require the COL Appendix C Table of Contents on pages C-1 through C-5 to be revised accordingly.

Assigned Division Deletions

Revise COL Appendix C (and plant-specific Tier 1) Section 2.1, Reactor, Subsection 2.1.2, Reactor Coolant System, Table 2.1.2-4, as shown below:

Table 2.1.2-4 Inspections, Tests, Analyses, and Acceptance Criteria				
No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
* * *				
26	2.1.02.07b	7.b) The Class 1E components identified in Table 2.1.2-1 are powered from their respective Class 1E division. Not used per Amendment No. ###.	Testing will be performed on the RCS by providing a simulated test signal in each Class 1E division.	A simulated test signal exists at the Class 1E equipment identified in Table 2.1.2-1 when the assigned Class 1E division is provided the test signal.
* * *				

Revise COL Appendix C (and plant-specific Tier 1) Section 2.1, Reactor, Subsection 2.1.3, Reactor System, Table 2.1.3-2, as shown below:

Table 2.1.3-2 Inspections, Tests, Analyses, and Acceptance Criteria				
No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
* * *				
83	2.1.03.09b	<u>Not used per Amendment No. ###.</u> 9.b) The Class 1E components identified in Table 2.1.3-1 are powered from their respective Class 1E division.	Testing will be performed by providing simulated test signals in each Class 1E division.	A simulated test signal exists for Class 1E equipment identified in Table 2.1.3-1 when the assigned Class 1E division is provided the test signal.
* * *				

Revise COL Appendix C (and plant-specific Tier 1) Section 2.2, Nuclear Safety Systems, Subsection 2.2.1, Containment System, Table 2.2.1-3, as shown below:

Table 2.2.1-3 Inspections, Tests, Analyses, and Acceptance Criteria				
No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
* * *				
103	2.2.01.06b	<u>Not used per Amendment No. ###.</u> 6.b) The Class 1E components identified in Table 2.2.1-1 are powered from their respective Class 1E division.	Testing will be performed by providing a simulated test signal in each Class 1E division.	A simulated test signal exists at the Class 1E equipment identified in Table 2.2.1-1 when the assigned Class 1E division is provided the test signal.
* * *				

Revise COL Appendix C (and plant-specific Tier 1) Section 2.2, Nuclear Safety Systems, Subsection 2.2.3, Passive Core Cooling System, Table 2.2.3-4, as shown below:

Table 2.2.3-4 Inspections, Tests, Analyses, and Acceptance Criteria				
No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
* * *				
172	2.2.03.07b	<u>Not used per Amendment No. ###.</u> 7.b) The Class 1E components identified in Table 2.2.3-1 are powered from their respective Class 1E division.	Testing will be performed by providing a simulated test signal in each Class 1E division.	A simulated test signal exists at the Class 1E equipment identified in Table 2.2.3-1 when the assigned Class 1E division is provided the test signal.
* * *				

Revise COL Appendix C (and plant-specific Tier 1) Section 2.2, Nuclear Safety Systems, Subsection 2.2.4, Steam Generator System, Table 2.2.4-4, as shown below:

Table 2.2.4-4 Inspections, Tests, Analyses, and Acceptance Criteria				
No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
* * *				
233	2.2.4.07b	<u>Not used per Amendment No. ###.</u> 7.b) The Class 1E components identified in Table 2.2.4-1 are powered from their respective Class 1E division.	Testing will be performed by providing a simulated test signal in each Class 1E division.	A simulated test signal exists at the Class 1E equipment identified in Table 2.2.4-1 when the assigned Class 1E division is provided the test signal.
* * *				

Revise COL Appendix C (and plant-specific Tier 1) Section 2.2, Nuclear Safety Systems, Subsection 2.2.5, Main Control Room Emergency Habitability System, Table 2.2.5-5, as shown below:

Table 2.2.5-5 Inspections, Tests, Analyses, and Acceptance Criteria				
No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
* * *				
263	2.2.05.06a	<p><u>Not used per Amendment No. ###.</u> 6.a) The Class 1E components identified in Table 2.2.5-1 are powered from their respective Class 1E division.</p>	<p>Testing will be performed by providing a simulated test signal in each Class 1E division.</p>	<p>A simulated test signal exists at the Class 1E equipment identified in Table 2.2.5-1 when the assigned Class 1E division is provided the test signal.</p>
* * *				

Revise COL Appendix C (and plant-specific Tier 1) Section 2.3, Auxiliary Systems, Subsection 2.3.2, Chemical and Volume Control System, Table 2.3.2-4, as shown below:

Table 2.3.2-4 Inspections, Tests, Analyses, and Acceptance Criteria				
No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
* * *				
296	2.3.02.06b	<p><u>Not used per Amendment No. ###.</u> 6.b) The Class 1E components identified in Table 2.3.2-1 are powered from their respective Class 1E division.</p>	<p>Testing will be performed on the CVS by providing a simulated test signal in each Class 1E division.</p>	<p>A simulated test signal exists at the Class 1E equipment identified in Table 2.3.2-1 when the assigned Class 1E division is provided the test signal.</p>
* * *				

Revise COL Appendix C (and plant-specific Tier 1) Section 2.3, Auxiliary Systems, Subsection 2.3.6, Normal Residual Heat Removal System, Table 2.3.6-4, as shown below:

Table 2.3.6-4 Inspections, Tests, Analyses, and Acceptance Criteria				
No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
* * *				
368	2.3.06.07b	<u>Not used per Amendment No. ###.</u> 7.b) The Class 1E components identified in Table 2.3.6-1 are powered from their respective Class 1E division.	Testing will be performed on the RNS by providing a simulated test signal in each Class 1E division.	A simulated test signal exists at the Class 1E equipment identified in Table 2.3.6-1 when the assigned Class 1E division is provided the test signal.
* * *				

Revise COL Appendix C (and plant-specific Tier 1) Section 2.3, Auxiliary Systems, Subsection 2.3.7, Spent Fuel Pool Cooling System, Table 2.3.7-4, as shown below:

Table 2.3.7-4 Inspections, Tests, Analyses, and Acceptance Criteria				
No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
* * *				
399	2.3.07.06a	<u>Not used per Amendment No. ###.</u> 6.a) The Class 1E components identified in Table 2.3.7-1 are powered from their respective Class 1E division.	Testing will be performed on the SFS by providing a simulated test signal in each Class 1E division.	A simulated test signal exists at the Class 1E components identified in Table 2.3.7-1 when the assigned Class 1E division is provided the test signal.
* * *				

Revise COL Appendix C (and plant-specific Tier 1) Section 2.3, Auxiliary Systems, Subsection 2.3.10, Liquid Radwaste System, Table 2.3.10-4, as shown below:

Table 2.3.10-4 Inspections, Tests, Analyses, and Acceptance Criteria				
No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
* * *				
878	2.3.10.11a	<u>Not used per Amendment No. ###.</u> 11. a) The Class 1E components identified in Table 2.3.10-1 are powered from their respective Class 1E division.	Testing will be performed on the WLS by providing a simulated test signal in each Class 1E division.	A simulated test signal exists at the Class 1E components identified in Table 2.3.10-1 when the assigned Class 1E division is provided the test signal.
* * *				

Revise COL Appendix C (and plant-specific Tier 1) Section 2.3, Auxiliary Systems, Subsection 2.3.13, Primary Sampling System, Table 2.3.13-3, as shown below:

Table 2.3.13-3 Inspections, Tests, Analyses, and Acceptance Criteria				
No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
* * *				
467	2.3.13.06b	<u>Not used per Amendment No. ###.</u> 6.b) The Class 1E components identified in Table 2.3.13-1 are powered from their respective Class 1E division.	Testing will be performed on the PSS by providing a simulated test signal in each Class 1E division.	A simulated test signal exists at the Class 1E equipment identified in Table 2.3.13-1 when the assigned Class 1E division is provided the test signal.
* * *				

Revise COL Appendix C (and plant-specific Tier 1) Section 2.5, Instrumentation and Control Systems, Subsection 2.5.2, Protection and Safety Monitoring System, Table 2.5.2-8, as shown below:

Table 2.5.2-8 Inspections, Tests, Analyses, and Acceptance Criteria				
No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
* * *				
527	2.5.02.05a	<u>Not used per Amendment No. ###.</u> 5.a) The Class 1E equipment, identified in Table 2.5.2-1, is powered from its respective Class 1E division.	Tests will be performed by providing a simulated test signal in each Class 1E division.	A simulated test signal exists at the Class 1E equipment identified in Table 2.5.2-1 when the assigned Class 1E division is provided the test signal.
* * *				

Revise COL Appendix C (and plant-specific Tier 1) Section 2.6, Electrical Power Systems, Subsection 2.6.1, Main ac Power System, Table 2.6.1-4, as shown below:

Table 2.6.1-4 Inspections, Tests, Analyses, and Acceptance Criteria				
No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
* * *				
582	2.6.01.03a	<u>Not used per Amendment No. ###.</u> 3.a) The Class 1E breaker control power for the equipment identified in Table 2.6.1-1 are powered from their respective Class 1E division.	Testing will be performed on the ECS by providing a simulated test signal in each Class 1E division.	A simulated test signal exists at the Class 1E equipment identified in Table 2.6.1-1 when the assigned Class 1E division is provided the test signal.
* * *				

Revise COL Appendix C (and plant-specific Tier 1) Section 2.7, HVAC Systems, Subsection 2.7.1, Nuclear Island Nonradioactive Ventilation System, Table 2.7.1-4, as shown below:

Table 2.7.1-4 Inspections, Tests, Analyses, and Acceptance Criteria				
No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
* * *				
687	2.7.01.06a	<p><u>Not used per Amendment No. ###.</u> 6.a) The Class 1E components identified in Table 2.7.1-1 are powered from their respective Class 1E division.</p>	<p>Testing will be performed on the VBS by providing a simulated test signal in each Class 1E division.</p>	<p>A simulated test signal exists at the Class 1E equipment identified in Table 2.7.1-1 when the assigned Class 1E division is provided the test signal.</p>
* * *				

Consolidation of Cable Separation ITAAC

Revise COL Appendix C (and plant-specific Tier 1) Section 3.3, Buildings, Table 3.3-6, as shown below to consolidate Nos. 789, 792, 800, 803, 806, and 809:

Table 3.3-6 Inspections, Tests, Analyses, and Acceptance Criteria				
No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
* * *				
789	3.3.00.07aa	Not used per Amendment No. ###. 7.a) Class 1E electrical cables, communication cables associated with only one division, and raceways that route the Class 1E electrical cables and the communication cables are identified according to applicable color coded Class 1E divisions.	Inspections of the as-built Class 1E cables and the as-built raceways that route the Class 1E cables will be conducted.	a) Class 1E electrical cables, and communication cables associated with only one division, and the raceways that route these cables inside containment are identified by the appropriate color code.
* * *				
792	3.3.00.07ba	Not used per Amendment No. ###. 7.b) Class 1E divisional electrical cables and communication cables associated with only one division are routed in their respective divisional raceways.	Inspections of the as-built Class 1E divisional cables and the as-built raceways that route the Class 1E cables will be conducted.	a) Class 1E electrical cables and communication cables inside containment associated with only one division are routed in raceways assigned to the same division. There are no other safety division electrical cables in a raceway assigned to a different division.
* * *				
800	3.3.00.07d. ii.a	7.d) Physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.	Inspections of the as-built raceways that route Class 1E cables will be performed to confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following: ii.a) Within other plant areas (hazard areas), the minimum separation is defined by one of the following:	Results of the inspection will confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following: ii.a) Within other plant areas inside containment (hazard areas), the separation meets one of

**Table 3.3-6
 Inspections, Tests, Analyses, and Acceptance Criteria**

No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
			<p>1) The minimum vertical separation is 5 feet and the minimum horizontal separation is 3 feet.</p> <p>2) The minimum vertical separation is 12 inches and the minimum horizontal separation is 6 inches for raceways containing only instrumentation and control and low-voltage power cables $\leq 2/0$ AWG. This minimum vertical separation is 3 inches for the configuration with a conduit above and crossing the open tray at an angle equal to or greater than 45 degrees.</p> <p>3) The minimum vertical separation is 12 inches and the minimum horizontal separation is 6 inches between a conduit and an open configuration for low- voltage power cables greater than 2/0 AWG but not greater than 750 kcmil. The vertical separation is 3 inches if a conduit is above and crossing an open tray at an angle equal to or greater than 45 degrees.</p> <p>4) For configurations that involve exclusively limited energy content cables (instrumentation and control), the minimum vertical separation is 1 inch and the minimum horizontal separation is 1 inch.</p> <p>5) For configurations</p>	<p>the following:</p> <p>1) The vertical separation is 5 feet or more and the horizontal separation is 3 feet or more.</p> <p>2) The minimum vertical separation is 12 inches and the minimum horizontal separation is 6 inches for raceways containing only instrumentation and control and low-voltage power cables $\leq 2/0$ AWG. This minimum vertical separation may be reduced to 3 inches for the configuration with a conduit above and crossing the open tray at an angle equal to or greater than 45 degrees.</p> <p>3) The minimum vertical separation is 12 inches and the minimum horizontal separation is 6 inches between a conduit and an open configuration for low- voltage power cables greater than 2/0 AWG but not greater than 750 kcmil. The vertical separation may be reduced to 3 inches if a conduit is above and crossing an open tray at an angle equal to or greater than 45 degrees.</p> <p>4) For configurations that involve exclusively limited energy content cables (instrumentation and control), the minimum vertical separation is 1 inch and the minimum horizontal separation is 1 inch.</p> <p>5) For configurations that</p>

**Table 3.3-6
 Inspections, Tests, Analyses, and Acceptance Criteria**

No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
			<p>involving an enclosed raceway and an open raceway with low-voltage power cables, the minimum vertical separation is 1 inch if the enclosed raceway is below the open raceway.</p> <p>6) For configuration involving enclosed raceways, the minimum separation is 1 inch in both horizontal and vertical directions.</p> <p>7) The minimum vertical separation is 1 inch and the minimum horizontal separation is 1 inch for configurations with a non-safety conduit and a free air safety cable with low-voltage power cables and below.</p> <p><u>iii) Where minimum separation distances are not maintained, the circuits are run in enclosed raceways or barriers are provided.</u></p> <p><u>iv) Separation distances less than those specified above and not run in enclosed raceways or provided with barriers are based on analysis.</u></p> <p><u>v) Non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is considered as associated circuits and subject to Class 1E requirements.</u></p>	<p>involve an enclosed raceway and an open raceway with low-voltage power cables, the minimum vertical separation is 1 inch if the enclosed raceway is below the open raceway.</p> <p>6) For configurations that involve enclosed raceways, the minimum vertical and horizontal separation is 1 inch.</p> <p>7) The minimum vertical separation is 1 inch and the minimum horizontal separation is 1 inch for configurations with a non-safety conduit and a free air safety cable with low-voltage power cables and below.</p> <p><u>iii.a) Where minimum separation distances are not met inside containment, the circuits are run in enclosed raceways or barriers are provided.</u></p> <p><u>iv.a) For areas inside containment, a report exists and concludes that separation distances less than those specified above and not provided with enclosed raceways or barriers have been analyzed.</u></p> <p><u>v.a) For areas inside containment, non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is treated as</u></p>

Table 3.3-6 Inspections, Tests, Analyses, and Acceptance Criteria				
No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
		<p><u>7.a) Class 1E electrical cables, communication cables associated with only one division, and raceways that route the Class 1E electrical cables and the communication cables are identified according to applicable color-coded Class 1E divisions.</u></p> <p><u>7.b) Class 1E divisional electrical cables and communication cables associated with only one division are routed in their respective divisional raceways.</u></p>	<p><u>Inspections of the as-built Class 1E cables and the as-built raceways that route the Class 1E cables will be conducted.</u></p> <p><u>Inspections of the as-built Class 1E divisional cables and the as-built raceways that route the Class 1E cables will be conducted.</u></p>	<p><u>Class 1E wiring.</u></p> <p><u>a) Class 1E electrical cables, and communication cables associated with only one division, and the raceways that route these cables inside containment are identified by the appropriate color code.</u></p> <p><u>a) Class 1E electrical cables and communication cables inside containment associated with only one division are routed in raceways assigned to the same division. There are no other safety division electrical cables in a raceway assigned to a different division.</u></p>
* * *				
803	3.3.00.07d. iii.a	<p><u>Not used per Amendment No. .</u></p> <p><u>7.d) Physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.</u></p>	<p><u>Inspections of the as-built raceways that route Class 1E cables will be performed to confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following:</u></p> <p><u>iii) Where minimum separation distances are not maintained, the circuits are run in enclosed raceways or barriers are provided.</u></p>	<p><u>Results of the inspection will confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following:</u></p> <p><u>iii.a) Where minimum separation distances are not met inside containment, the circuits are run in enclosed raceways or barriers are provided.</u></p>
* * *				

**Table 3.3-6
 Inspections, Tests, Analyses, and Acceptance Criteria**

No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
806	3.3.00.07d. iv.a	Not used per Amendment No. ###. 7.d) Physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.	Inspections of the as-built raceways that route Class 1E cables will be performed to confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following: iv) Separation distances less than those specified above and not run in enclosed raceways or provided with barriers are based on analysis.	Results of the inspection will confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following: iv.a) For areas inside containment, a report exists and concludes that separation distances less than those specified above and not provided with enclosed raceways or barriers have been analyzed.
* * *				
809	3.3.00.07d. v.a	Not used per Amendment No. ###. 7.d) Physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.	Inspections of the as-built raceways that route Class 1E cables will be performed to confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following: v) Non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is considered as associated circuits and subject to Class 1E requirements.	Results of the inspection will confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following: v.a) For areas inside containment, non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is treated as Class 1E wiring.
* * *				

**Revise COL Appendix C (and plant-specific Tier 1) Section 3.3, Buildings,
 Table 3.3-6, as shown below to consolidate Nos. 790, 793, 801, 804, 807, and 810:**

Table 3.3-6 Inspections, Tests, Analyses, and Acceptance Criteria				
No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
* * *				
790	3.3.00.07ab	Not used per Amendment No. ###. 7.a) Class 1E electrical cables, communication cables associated with only one division, and raceways that route the Class 1E electrical cables and the communication cables are identified according to applicable color-coded Class 1E divisions.	Inspections of the as-built Class 1E cables and the as-built raceways that route the Class 1E cables will be conducted.	b) Class 1E electrical cables, and communication cables associated with only one division, and the raceways that route these cables in the non-radiologically controlled area of the auxiliary building are identified by the appropriate color code.
* * *				
793	3.3.00.07bb	Not used per Amendment No. ###. 7.b) Class 1E divisional electrical cables and communication cables associated with only one division are routed in their respective divisional raceways.	Inspections of the as-built Class 1E divisional cables and the as-built raceways that route the Class 1E cables will be conducted.	b) Class 1E electrical cables and communication cables in the non-radiologically controlled area of the auxiliary building associated with only one division are routed in raceways assigned to the same division. There are no other safety division electrical cables in a raceway assigned to a different division.
* * *				
801	3.3.00.07d. ii.b	7.d) Physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.	Inspections of the as-built raceways that route Class 1E cables will be performed to confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following: ii.b) Within other plant areas (limited hazard areas), the minimum separation is	Results of the inspection will confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following: ii.b) Within other plant areas inside the non-radiologically

**Table 3.3-6
 Inspections, Tests, Analyses, and Acceptance Criteria**

No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
			<p>defined by one of the following:</p> <ol style="list-style-type: none"> 1) The minimum vertical separation is 5 feet and the minimum horizontal separation is 3 feet. 2) The minimum vertical separation is 12 inches and the minimum horizontal separation is 6 inches for raceways containing only instrumentation and control and low-voltage power cables ≤ 2/0 AWG. This minimum vertical separation is 3 inches for the configuration with a conduit above and crossing the open tray at an angle equal to or greater than 45 degrees. 3) The minimum vertical separation is 12 inches and the minimum horizontal separation is 6 inches between a conduit and an open configuration for low-voltage power cables greater than 2/0 AWG but not greater than 750 kcmil. The vertical separation is 3 inches if a conduit is above and crossing an open tray at an angle equal to or greater than 45 degrees. 4) For configurations that involve exclusively limited energy content cables (instrumentation and control), the minimum vertical separation is 1 inch and the minimum horizontal separation is 1 inch. 5) For configurations 	<p>controlled area of the auxiliary building (limited hazard areas), the separation meets one of the following:</p> <ol style="list-style-type: none"> 1) The vertical separation is 5 feet or more and the horizontal separation is 3 feet or more. 2) The minimum vertical separation is 12 inches and the minimum horizontal separation is 6 inches for raceways containing only instrumentation and control and low-voltage power cables ≤ 2/0 AWG. This minimum vertical separation may be reduced to 3 inches for the configuration with a conduit above and crossing the open tray at an angle equal to or greater than 45 degrees. 3) The minimum vertical separation is 12 inches and the minimum horizontal separation is 6 inches between a conduit and an open configuration for low-voltage power cables greater than 2/0 AWG but not greater than 750 kcmil. The vertical separation may be reduced to 3 inches if a conduit is above and crossing an open tray at an angle equal to or greater than 45 degrees. 4) For configurations that involve exclusively limited energy content cables (instrumentation and control), the minimum vertical separation is 1 inch and the minimum horizontal separation is 1 inch. 5) For configurations that

**Table 3.3-6
 Inspections, Tests, Analyses, and Acceptance Criteria**

No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
			<p>involving an enclosed raceway and an open raceway with low-voltage power cables, the minimum vertical separation is 1 inch if the enclosed raceway is below the open raceway.</p> <p>6) For configuration involving enclosed raceways, the minimum separation is 1 inch in both horizontal and vertical directions.</p> <p>7) The minimum vertical separation is 1 inch and the minimum horizontal separation is 1 inch for configurations with a non-safety conduit and a free air safety cable with low-voltage power cables and below.</p> <p><u>iii) Where minimum separation distances are not maintained, the circuits are run in enclosed raceways or barriers are provided.</u></p> <p><u>iv) Separation distances less than those specified above and not run in enclosed raceways or provided with barriers are based on analysis.</u></p> <p><u>v) Non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is considered as associated circuits and subject to Class</u></p>	<p>involve an enclosed raceway and an open raceway with low-voltage power cables, the minimum vertical separation is 1 inch if the enclosed raceway is below the open raceway.</p> <p>6) For configurations that involve enclosed raceways, the minimum vertical and horizontal separation is 1 inch.</p> <p>7) The minimum vertical separation is 1 inch and the minimum horizontal separation is 1 inch for configurations with a non-safety conduit and a free air safety cable with low-voltage power cables and below.</p> <p><u>iii.b) Where minimum separation distances are not met inside the non-radiologically controlled area of the auxiliary building, the circuits are run in enclosed raceways or barriers are provided.</u></p> <p><u>iv.b) For areas inside the non-radiologically controlled area of the auxiliary building, a report exists and concludes that separation distances less than those specified above and not provided with enclosed raceways or barriers have been analyzed.</u></p> <p><u>v.b) For areas inside the non-radiologically controlled area of the auxiliary building, non-Class 1E wiring that is not separated from Class 1E or associated wiring by the</u></p>

**Table 3.3-6
 Inspections, Tests, Analyses, and Acceptance Criteria**

No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
		<p><u>7.a) Class 1E electrical cables, communication cables associated with only one division, and raceways that route the Class 1E electrical cables and the communication cables are identified according to applicable color-coded Class 1E divisions.</u></p> <p><u>7.b) Class 1E divisional electrical cables and communication cables associated with only one division are routed in their respective divisional raceways.</u></p>	<p><u>1E requirements.</u></p> <p><u>Inspections of the as-built Class 1E cables and the as-built raceways that route the Class 1E cables will be conducted.</u></p> <p><u>Inspections of the as-built Class 1E divisional cables and the as-built raceways that route the Class 1E cables will be conducted.</u></p>	<p><u>minimum separation distance or by a barrier or analyzed is treated as Class 1E wiring.</u></p> <p><u>b) Class 1E electrical cables, and communication cables associated with only one division, and the raceways that route these cables in the non-radiologically controlled area of the auxiliary building are identified by the appropriate color code.</u></p> <p><u>b) Class 1E electrical cables and communication cables in the non-radiologically controlled area of the auxiliary building associated with only one division are routed in raceways assigned to the same division. There are no other safety division electrical cables in a raceway assigned to a different division.</u></p>
* * *				
804	3.3.00.07d. iii.b	<p><u>Not used per Amendment No. ###.</u></p> <p><u>7.d) Physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.</u></p>	<p><u>Inspections of the as-built raceways that route Class 1E cables will be performed to confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following:</u></p> <p><u>iii) Where minimum separation distances are not maintained, the circuits are run in enclosed raceways or barriers are provided.</u></p>	<p><u>Results of the inspection will confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following:</u></p> <p><u>iii.b) Where minimum separation distances are not met inside the non-radiologically controlled area of the auxiliary building, the circuits are run in enclosed</u></p>

Table 3.3-6 Inspections, Tests, Analyses, and Acceptance Criteria				
No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
				raceways or barriers are provided.
* * *				
807	3.3.00.07d. iv.b	Not used per Amendment No. ###. 7.d) Physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.	Inspections of the as-built raceways that route Class 1E cables will be performed to confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following: iv) Separation distances less than those specified above and not run in enclosed raceways or provided with barriers are based on analysis.	Results of the inspection will confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following: iv.b) For areas inside the non-radiologically controlled area of the auxiliary building, a report exists and concludes that separation distances less than those specified above and not provided with enclosed raceways or barriers have been analyzed.
* * *				
810	3.3.00.07d. v.b	Not used per Amendment No. ###. 7.d) Physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.	Inspections of the as-built raceways that route Class 1E cables will be performed to confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following: v) Non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is considered as associated circuits and subject to Class	Results of the inspection will confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following: v.b) For areas inside the non-radiologically controlled area of the auxiliary building, non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation

Table 3.3-6 Inspections, Tests, Analyses, and Acceptance Criteria				
No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
			IE requirements.	distance or by a barrier or analyzed is treated as Class IE wiring.
* * *				

**Revise COL Appendix C (and plant-specific Tier 1) Section 3.3, Buildings,
 Table 3.3-6, as shown below to consolidate Nos. 791, 794, 802, 805, 808, and 811:**

Table 3.3-6 Inspections, Tests, Analyses, and Acceptance Criteria				
No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
* * *				
791	3.3.00.07ac	Not used per Amendment No. ###. 7.a) Class 1E electrical cables, communication cables associated with only one division, and raceways that route the Class 1E electrical cables and the communication cables are identified according to applicable color-coded Class 1E divisions.	Inspections of the as-built Class 1E cables and the as-built raceways that route the Class 1E cables will be conducted.	e) Class 1E electrical cables, and communication cables associated with only one division, and the raceways that route these cables in the radiologically controlled area of the auxiliary building are identified by the appropriate color code.
* * *				
794	3.3.00.07bc	Not used per Amendment No. ###. 7.b) Class 1E divisional electrical cables and communication cables associated with only one division are routed in their respective divisional raceways.	Inspections of the as-built Class 1E divisional cables and the as-built raceways that route the Class 1E cables will be conducted.	e) Class 1E electrical cables and communication cables in the radiologically controlled area of the auxiliary building associated with only one division are routed in raceways assigned to the same division. There are no other safety division electrical cables in a raceway assigned to a different division.
* * *				
802	3.3.00.07d. ii.c	7.d) Physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.	Inspections of the as-built raceways that route Class 1E cables will be performed to confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following: ii.c) Within other plant areas (limited hazard areas), the minimum separation is defined by one of the	Results of the inspection will confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following: ii.c) Within other plant areas inside the radiologically controlled area of the auxiliary

**Table 3.3-6
 Inspections, Tests, Analyses, and Acceptance Criteria**

No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
			<p>following:</p> <p>1) The minimum vertical separation is 5 feet and the minimum horizontal separation is 3 feet.</p> <p>2) The minimum vertical separation is 12 inches and the minimum horizontal separation is 6 inches for raceways containing only instrumentation and control and low-voltage power cables ≤ 2/0 AWG. This minimum vertical separation is 3 inches for the configuration with a conduit above and crossing the open tray at an angle equal to or greater than 45 degrees.</p> <p>3) The minimum vertical separation is 12 inches and the minimum horizontal separation is 6 inches between a conduit and an open configuration for low-voltage power cables greater than 2/0 AWG but not greater than 750 kcmil. The vertical separation is 3 inches if a conduit is above and crossing an open tray at an angle equal to or greater than 45 degrees.</p> <p>4) For configurations that involve exclusively limited energy content cables (instrumentation and control), the minimum vertical separation is 1 inch and the minimum horizontal separation is 1 inch.</p> <p>5) For configurations involving an enclosed</p>	<p>building (limited hazard areas), the separation meets one of the following:</p> <p>1) The vertical separation is 5 feet or more and the horizontal separation is 3 feet or more.</p> <p>2) The minimum vertical separation is 12 inches and the minimum horizontal separation is 6 inches for raceways containing only instrumentation and control and low-voltage power cables ≤ 2/0 AWG. This minimum vertical separation may be reduced to 3 inches for the configuration with a conduit above and crossing the open tray at an angle equal to or greater than 45 degrees.</p> <p>3) The minimum vertical separation is 12 inches and the minimum horizontal separation is 6 inches between a conduit and an open configuration for low-voltage power cables greater than 2/0 AWG but not greater than 750 kcmil. The vertical separation may be reduced to 3 inches if a conduit is above and crossing an open tray at an angle equal to or greater than 45 degrees.</p> <p>4) For configurations that involve exclusively limited energy content cables (instrumentation and control), the minimum vertical separation is 1 inch and the minimum horizontal separation is 1 inch.</p> <p>5) For configurations that involve an enclosed raceway</p>

**Table 3.3-6
 Inspections, Tests, Analyses, and Acceptance Criteria**

No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
			<p>raceway and an open raceway with low-voltage power cables, the minimum vertical separation is 1 inch if the enclosed raceway is below the open raceway.</p> <p>6) For configuration involving enclosed raceways, the minimum separation is 1 inch in both horizontal and vertical directions.</p> <p>7) The minimum vertical separation is 1 inch and the minimum horizontal separation is 1 inch for configurations with a non-safety conduit and a free air safety cable with low-voltage power cables and below.</p> <p><u>iii) Where minimum separation distances are not maintained, the circuits are run in enclosed raceways or barriers are provided.</u></p> <p><u>iv) Separation distances less than those specified above and not run in enclosed raceways or provided with barriers are based on analysis.</u></p> <p><u>v) Non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is considered as associated circuits and subject to Class 1E requirements.</u></p>	<p>and an open raceway with low-voltage power cables, the minimum vertical separation is 1 inch if the enclosed raceway is below the open raceway.</p> <p>6) For configurations that involve enclosed raceways, the minimum vertical and horizontal separation is 1 inch.</p> <p>7) The minimum vertical separation is 1 inch and the minimum horizontal separation is 1 inch for configurations with a non-safety conduit and a free air safety cable with low-voltage power cables and below.</p> <p><u>iii.c) Where minimum separation distances are not met inside the radiologically controlled area of the auxiliary building, the circuits are run in enclosed raceways or barriers are provided.</u></p> <p><u>iv.c) For areas inside the radiologically controlled area of the auxiliary building, a report exists and concludes that separation distances less than those specified above and not provided with enclosed raceways or barriers have been analyzed.</u></p> <p><u>v.c) For areas inside the radiologically controlled area of the auxiliary building, non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is treated</u></p>

**Table 3.3-6
 Inspections, Tests, Analyses, and Acceptance Criteria**

No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
		<p><u>7.a) Class 1E electrical cables, communication cables associated with only one division, and raceways that route the Class 1E electrical cables and the communication cables are identified according to applicable color-coded Class 1E divisions.</u></p> <p><u>7.b) Class 1E divisional electrical cables and communication cables associated with only one division are routed in their respective divisional raceways.</u></p>	<p><u>Inspections of the as-built Class 1E cables and the as-built raceways that route the Class 1E cables will be conducted.</u></p> <p><u>Inspections of the as-built Class 1E divisional cables and the as-built raceways that route the Class 1E cables will be conducted.</u></p>	<p><u>as Class 1E wiring.</u></p> <p><u>c) Class 1E electrical cables, and communication cables associated with only one division, and the raceways that route these cables in the radiologically controlled area of the auxiliary building are identified by the appropriate color code.</u></p> <p><u>c) Class 1E electrical cables and communication cables in the radiologically controlled area of the auxiliary building associated with only one division are routed in raceways assigned to the same division. There are no other safety division electrical cables in a raceway assigned to a different division.</u></p>
* * *				
805	3.3.00.07d. iii.c	<p><u>Not used per Amendment No. ###.</u></p> <p><u>7.d) Physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.</u></p>	<p><u>Inspections of the as-built raceways that route Class 1E cables will be performed to confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following:</u></p> <p><u>iii) Where minimum separation distances are not maintained, the circuits are run in enclosed raceways or barriers are provided.</u></p>	<p><u>Results of the inspection will confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following:</u></p> <p><u>ii.e) Where minimum separation distances are not met inside the radiologically controlled area of the auxiliary building, the circuits are run in enclosed raceways or barriers are provided.</u></p>
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**Table 3.3-6
 Inspections, Tests, Analyses, and Acceptance Criteria**

No.	ITAAC No.	Design Commitment	Inspections, Tests, Analyses	Acceptance Criteria
808	3.3.00.07d. iv.c	Not used per Amendment No. ###. 7.d) Physical separation is maintained between Class 1E divisions and between Class 1E divisions and non Class 1E cables.	Inspections of the as-built raceways that route Class 1E cables will be performed to confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non Class 1E cables is consistent with the following: iv) Separation distances less than those specified above and not run in enclosed raceways or provided with barriers are based on analysis.	Results of the inspection will confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following: iv.c) For areas inside the radiologically controlled area of the auxiliary building, a report exists and concludes that separation distances less than those specified above and not provided with enclosed raceways or barriers have been analyzed.
* * *				
811	3.3.00.07d. v.c	Not used per Amendment No. ###. 7.d) Physical separation is maintained between Class 1E divisions and between Class 1E divisions and non Class 1E cables.	Inspections of the as-built raceways that route Class 1E cables will be performed to confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non Class 1E cables is consistent with the following: v) Non Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is considered as associated circuits and subject to Class 1E requirements.	Results of the inspection will confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following: v.c) For areas inside radiologically controlled area of the auxiliary building, non Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is treated as Class 1E wiring.
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