



April R. Rice
Manager
New Nuclear Licensing

May 15, 2015
NND-15-0289
10 CFR 52.99(c)(1)

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Subject: Virgil C. Summer Nuclear Station (VCSNS) Unit 3
Combined License No. NPF-94
Docket Number 52-028
ITAAC Closure Notification for ITAAC 2.2.03.08c.vi.02 [Index No. 190]

Attachments: References

The purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) in accordance with 10 CFR 52.99(c)(1) of the completion of Virgil C. Summer Nuclear Station (VCSNS) Unit 3 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.03.08c.vi.02 for verifying that the calculated volume of each of the Accumulator Tanks (ACCs) is greater than or equal to 2,000 ft³. The closure process for this ITAAC is based on the guidance described in NEI 08-01 (Reference 1), which was endorsed by the NRC in Regulatory Guide 1.215.

ITAAC Statement

Design Commitment:

8.c) The PXS provides RCS makeup, boration, and safety injection during design basis events.

Inspections, Tests, Analyses:

vi) Inspections of each of the following tanks will be conducted:

2. Accumulators

Acceptance Criteria:

vi) The calculated volume of each of the following tanks is as follows:

2. Accumulators $\geq 2,000 \text{ ft}^3$

ITAAC Determination Basis

Multiple ITAAC are performed to ensure the Passive Core Cooling System (PXS) provides Reactor Coolant System (RCS) makeup, boration, and safety injection during design basis events. This ITAAC requires an inspection of the Accumulator Tanks (ACCs) to confirm that the Accumulator volume is greater than or equal to 2,000 ft³. Inspections of each of the ACCs were conducted to verify that the calculated volume of each of the ACCs is greater than or equal to 2,000 ft³.

Measurements were performed on site using a laser scanner to determine that the tank volume is greater than or equal to 2,000 ft³. Two scanner locations were used within each tank to provide complete scanning coverage of the internal surface of the ACCs. One complete data file consisting of the composite of the scans, and representative of the entire internal surface of the ACC, was analyzed. Features not representative of the final tank configuration such as control point targets, cables, tripod and other features that are not part of the final operating tank condition were removed from the data file. Once the data represented a closed geometric shape, the volume was calculated from the model. The calculated volume of the Unit 3, Accumulator A is 2,017.98 ft³, and the Unit 3, Accumulator B calculated volume is 2,016.99 ft³. This is documented in the AP1000 V.C. Summer Unit 3 Accumulator Tanks Volumetric Scanning Report (Reference 2).

ACC volume for both V.C. Summer Unit 3 ACCs is greater than or equal to 2,000 ft³ and meets ITAAC 2.2.03.08c.vi.02 acceptance criteria.

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, SCE&G performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found that there are no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.2.03.08c.vi.02 (Reference 3) and available for NRC inspection.

ITAAC Completion Statement

Based on the above information, SCE&G hereby notifies the NRC that ITAAC 2.2.03.08c.vi.02 was performed for VCSNS Unit 3 and that the prescribed acceptance criteria are met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

We request NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99(e)(1).

If there are any questions, please contact Ryder Thompson at (803) 941-9812.

Sincerely,

A handwritten signature in dark ink, appearing to read "April R. Rice".

April R. Rice
Manager
Nuclear Licensing
New Nuclear Deployment

- c. Document Control Desk
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References (available for NRC inspection):

1. NEI 08-01, Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52.
2. VS3-MT02-VDR-001, AP1000 V.C. Summer Unit 3 Accumulator Tanks Volumetric Scanning Report
3. ITAAC 2.2.03.08c.vi.02 Completion Package