



April R. Rice  
Manager  
New Nuclear Licensing

May 9, 2016  
NND-16-0139  
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 2.3.11.03a [Index No. 453]

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 2.3.11.03a for verifying that the contained volume of each activated carbon delay bed (delay beds) is greater than or equal to 80 ft<sup>3</sup>. 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:**

*3.a) The WGS provides the nonsafety-related function of processing radioactive gases prior to discharge.*

#### **Inspections, Tests, Analyses:**

*Inspection will be performed to verify the contained volume of each of the activated carbon delay beds, WGS-MV02A and WGS-MV02B.*

#### **Acceptance Criteria:**

*A report exists and concludes that the contained volume in each of the activated carbon delay beds, WGS-MV02A and WGS-MV02B, is at least 80 ft<sup>3</sup>.*

### **ITAAC Determination Basis**

Inspections were performed to confirm that the Gaseous Radwaste System (WGS) provides the nonsafety-related function of processing radioactive gases prior to discharge. This ITAAC requires confirmation of activated carbon delay bed contained volume necessary to demonstrate appropriate capacity for expected radioactive gases produced during normal reactor operation, including anticipated operational occurrences.

Inspections of each delay bed were conducted to verify that the contained volume of each unit is at least 80 ft<sup>3</sup>.

To confirm that the volume of each of the activated carbon delay beds (WGS-MV02A and WGS-MV02B) is greater than or equal to 80.0 ft<sup>3</sup>, the delay bed fabricator performed inspections, measurements, and calculations upon final fabrication of the activated carbon delay beds. To calculate the volume, the fabricator initially determined the weight of each empty delay bed using a scale. The delay beds were then filled with water, and the fabricator determined the weight of the full delay beds. The weight of the empty delay beds was subtracted from the weight of the full delay beds to determine the weight of the water within the contained volume of each delay bed. The water weight was converted to volume using the density of water, compensated for temperature at the time of measurement. The contained volume of delay bed WGS-MV02A is 86.51 ft<sup>3</sup>, and the contained volume of delay bed WGS-MV02B is 86.56 ft<sup>3</sup>. These measurements and calculations are documented in the Data Package and Quality Release for the delay beds (Reference 2).

The contained volume for each of the V.C. Summer Unit 3 activated carbon delay beds is at least 80 ft<sup>3</sup> and meets ITAAC 2.3.11.03a 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 2.3.11.03a (Reference 3) and available for NRC inspection.

### **ITAAC Completion Statement**

Based on the above information, SCE&G hereby notifies the NRC that ITAAC 2.3.11.03a was performed for VCSNS Unit 3 and that the prescribed acceptance criteria are met.

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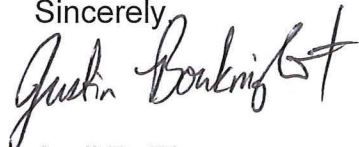
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Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

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,

  
for April R. Rice

Manager

Nuclear Licensing

New Nuclear Deployment

RT/AR/hz

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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-MV6H-VQQ-002, MV6H Quality Release and Certificate of Conformance
3. ITAAC 2.3.11.03a Completion Package