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January 30, 2017
NND-17-0027
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 on Completion of ITAAC 2.5.05.03a.i
[Index No. 568]

Attachments: (1) References
(2) Equipment Qualification ITAAC Compliance Matrix for Harsh
Environment Qualified Class 1E Equipment Listed in Table 2.5.5-1

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 2.5.05.03a.i. This ITAAC verifies that a report exists and concludes the Class 1E equipment identified in Table 2.5.5-1 for the In-Core Instrumentation System as being qualified for harsh environment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of safety function for the time required to perform the safety function. 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 Class 1E equipment identified in Table 2.5.5-1 as being qualified for a harsh environment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of safety function, for the time required to perform the safety function.*

Inspections, Tests, Analyses:

- i) *Type tests, analysis, or a combination of type tests and analysis will be performed on Class 1E equipment located in a harsh environment.*

Acceptance Criteria:

- i) *A report exists and concludes that the Class 1E equipment identified in Table 2.5.5-1 as being qualified for a harsh environment. This equipment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of safety function for the time required to perform the safety function.*

ITAAC Determination Basis

Multiple ITAAC are performed to demonstrate that the Class 1E equipment in the In-Core Instrumentation System identified as being qualified for a harsh environment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of safety function for the time required to perform the safety function. The subject ITAAC requires type tests, analysis, or a combination of type tests and analysis to be performed on Class 1E equipment located in a harsh environment.

Equipment qualification reports for the Class 1E equipment identified in Table 2.5.5-1 (Attachment 2) as being qualified for a harsh environment conclude that the equipment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of safety function for the time required to perform the safety function.

For Class 1E electrical components, type testing was performed in accordance with IEEE 323-1974 (Reference 2) and Regulatory Guide 1.89, "Qualification of Class 1E Equipment for Nuclear Power Plants," to meet the requirements of 10 CFR 50.49, "Environmental Qualification of Electrical Equipment Important to Safety for Nuclear Power Plants." Additional information about the methods used to qualify safety-related equipment supplied for the AP1000 is provided in the V.C. Summer Units 2&3 Updated Final Safety Analysis Report, Appendix 3D, "Methodology for Qualifying AP1000 Safety-Related Electrical and Mechanical Equipment" (Reference 3).

An Equipment Qualification Data Package (EQDP) and Equipment Qualification Summary Report (EQSR) (References 4 and 5, respectively) are identified in Attachment 2 for each safety-related Class 1E electrical component located in a harsh environment. These documents contain the applicable test reports, analysis, and associated documentation and conclude the equipment identified in Table 2.5.5-1 can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of safety function for the time required to perform the safety function.

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 2.5.05.03a.i (Reference 6) and available for NRC inspection.

ITAAC Completion Statement

Based on the above information, SCE&G hereby notifies the NRC that ITAAC 2.5.05.03a.i 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,



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Attachment 1

References (available for NRC inspection):

1. NEI 08-01, Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52.
2. IEEE Std. 323-1974, "IEEE Standard for Qualifying Class 1E Equipment for Nuclear Power Generating Stations"
3. V.C. Summer Unit 2 and 3 Updated Final Safety Analysis Report, Appendix 3D, "Methodology for Qualifying AP1000 Safety-Related Electrical and Mechanical Equipment"
4. APP-JS94-VBR-002, "Equipment Qualification Data Package for In-core Instrumentation System (IIS) Cables and Connectors for Use in the AP1000 Plant"
5. APP-JS94-VBR-001, "Equipment Qualification Summary Report for In-core Instrumentation System (IIS) Cables and Connectors for Use in the AP1000 Plant"
6. ITAAC 2.5.05.03a.i Completion Package

Attachment 2

**EQUIPMENT QUALIFICATION ITAAC COMPLIANCE MATRIX FOR HARSH ENVIRONMENT QUALIFIED CLASS 1E
EQUIPMENT LISTED IN TABLE 2.5.5-1**

SYSTEM: IN-CORE INSTRUMENTATION SYSTEM

Equipment Name	Class 1E	Qual. for Harsh Envir.	EQDP Document Number	EQSR Document Number
Incore Thimble Assemblies (at least three assemblies in each core quadrant)	Yes ⁽¹⁾	Yes ⁽¹⁾	APP-JS94-VBR-002	APP-JS94-VBR-001

(1) Only applies to the safety-related assemblies. There are at least two safety-related assemblies in each core quadrant.