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Docket No.: 52-026

ND-20-1246
10 CFR 52.99(c)(2)U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
Supplement for AP1000 ITAAC 2.3.05.03a.ii [Index Number 344] Completion

Ladies and Gentlemen:

The purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) in accordance with 10 CFR 52.99(c)(2) of supplemental information regarding the completion status of Vogtle Electric Generating Plant (VEGP) Unit 4 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.3.05.03a.ii [Index Number 344]. This ITAAC verified that the polar crane was static-load tested to 125% of the rated load; and lift tested with a load that is 100% of the rated load, to demonstrate it lowers, stops, and holds the test load. This notification is being provided in accordance with NEI 08-01, "Industry Guideline for the ITAAC Closure Process under 10 CFR Part 52," which was endorsed by the NRC in Regulatory Guide 1.215.

Reason for Supplement

Additional actions were required to maintain the completed status of ITAAC 2.3.05.03a.ii following the submittal of Unit 4 ITAAC Closure Notification ND-20-0808 (ADAMS Accession Number ML20204B029) originally submitted July 22, 2020. Following an auxiliary hoist brake adjustment, an alternate Post-Work Verification (PWV) method was used to demonstrate the load holding capacity of the auxiliary hoist. The alternate PWV method was demonstrated during the crane certification testing and involves an industry standard practice used following holding brake maintenance.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

U.S. Nuclear Regulatory Commission
ND-20-1246
Page 2 of 4

If there are any questions, please contact Tom Petrak at 706-848-1575.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael J. Yox", written in a cursive style.

Michael J. Yox
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4
Supplement for AP1000 ITAAC 2.3.05.03a.ii [Index Number 344] Completion

MJY/TST/sfr

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U.S. Nuclear Regulatory Commission
ND-20-1246 Enclosure
Page 1 of 3

**Southern Nuclear Operating Company
ND-20-1246
Enclosure**

**Vogle Electric Generating Plant (VEGP) Unit 4
Supplement for AP1000 ITAAC 2.3.05.03a.ii [Index Number 344] Completion**

ITAAC Statement

Design Commitment

3.a) The polar crane is single failure proof.

Inspections/Tests/Analyses

ii) Testing of the polar crane is performed.

iii) Testing of the polar crane is performed.

Acceptance Criteria

ii) The polar crane shall be static-load tested to 125% of the rated load.

iii) The polar crane shall lift a test load that is 100% of the rated load. Then it shall lower, stop, and hold the test load.

Supplemental ITAAC Determination Basis

Following the closure of Unit 4 ITAAC 2.3.05.03a.ii (Reference 1), the polar crane auxiliary hoist holding brake required adjustment to restore 100% rated load holding capacity due to brake shoe wear. The holding brake adjustment was performed using work instructions based on the vendor manual guidance (Reference 2). The Post-Work Verification (PWV) for the adjustment was verification of the holding brake torque setting per the vendor manual. The actions taken are documented in Work Order 1214317 (Reference 3). This PWV method was different from that described in the original ITAAC closure document (i.e., rated load testing).

The holding brake torque value was verified initially during site installation. This PWV method (holding brake torque adjustment) is an industry standard practice consistent with the guidance of ASME B30.2. The Vogtle 3&4 UFSAR (Reference 4) Section 9.1.5.1.2 describes commitments for mechanical handling systems to industry standards including NUREGs 554 and 612, ASME NOG-1, and references to ASME B30.2. The ASME B30.2 Interpretations document (Reference 5) includes the following statement in response to a question about performing a load test following holding brake adjustment. "The B30.2 volume does not require or recommend 100% load testing of a crane after brake adjustment or wire rope replacement." This PWV method (holding brake torque verification) is considered acceptable for demonstrating that the polar crane auxiliary hoist can hold the rated load and therefore the ITAAC acceptance criteria remain satisfied. This action maintains the completed status of ITAAC 2.3.05.03a.ii.

References 2 and 3 are available for NRC inspection as part of Unit 4 ITAAC Completion Package (Reference 6).

Associated ITAAC Findings

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all ITAAC 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 Vogtle Unit 4 ITAAC 2.3.05.03a.ii Completion Package (Reference 7) has been supplemented (Reference 6) to include this additional information and is available for NRC inspection.

ITAAC Completion Maintained Statement

Based on the above information, SNC hereby notifies the NRC that the completed status of ITAAC 2.3.05.03a.ii for VEGP Unit 4 has been maintained, and that the prescribed acceptance criteria continue to be 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.

References (available for NRC inspection)

1. Unit 4 ITAAC Closure Notification ND-20-0808 (ADAMS Accession Number ML20204B029), July 22, 2020
2. SV4-MH01-MYR-001, Rev. 0, "Vogtle 4 Polar Crane Reference Package"
3. Maintenance Work Order 1214317, "Crash Cart-Emergent Contingency Repair of U4 Polar Crane"
4. Vogtle 3&4 Updated Final Safety Analysis Report, Rev. 9.1
5. ASME B30.2 Interpretations, "Replies to Technical Inquiries September 2005 Through January 2010"
6. 2.3.05.03a.ii-U4-CP-Rev1, ITAAC Completion Package Supplement
7. 2.3.05.03a.ii-U4-CP-Rev0, ITAAC Completion Package
8. 2.3.05.03a.ii-U4-MIF-01, 10/09/2020, "VEGP Unit(s) 4 ITAAC Maintenance Impact Form for ITAAC #: 2.3.05.03a.ii (344)"
9. NEI 08-01 Rev. 5 corrected June 2014, *Industry Guideline for the ITAAC Closure Process under 10 CFR Part 52*