

From: Santos, Cayetano
Sent: Wednesday, August 11, 2021 9:21 AM
To: Vogtle PEmails
Subject: FW: NRC staff talking points on ITAAC 570 discussion at 8-12-21 public meeting

From: Santos, Cayetano
Sent: Wednesday, August 11, 2021 9:21 AM
To: Kelli Roberts (KROBERTS@southernco.com) <KROBERTS@southernco.com>; Agee, Stephanie Y. <syagee@southernco.com>
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Kelli/Stephanie,

Below are NRC staff talking points for the ITAAC 570 discussion topic during the 8/12/21 public meeting.

Tanny

Proposed Questions

The ICN for Vogtle 3 ITAAC 570 (dated May 20, 2020) states, in part:

The Quality Release and Certificate of Conformance (Reference 1) verifies the cable assembly acceptance test results. The Field Service Report (Reference 2) verifies the as-built cable assemblies were installed in accordance with design drawings and installation specifications issued for construction, and work package requirements.

The as-built Class 1E head area cable assemblies were inspected to verify that the design specification and installation specifications are satisfied, to enable each cable to convey the safety-related core exit thermocouple signals to the PMS, as identified in the Combined License (COL) Appendix C ITAAC 2.5.05.03b, Design Description.

The inspections were performed and documented in accordance with manufacturer and vendor quality verification programs. The results of the inspections are documented in the Unit 3 Principal Closure Documents (References 1 and 2) supporting the ITAAC

2.5.05.03b Completion Package (Reference 3). The inspections confirm that each of the as-built Class 1E cable assemblies between the In-core Thermocouple elements and the connector boxes on the integrated head package have sheaths.

As revealed during the June 24 and July 8, 2021 public meetings, the incore instrument thimble assemblies (IITAs) have not been installed and the licensee would not plan to install them until fuel load for the reasons discussed during the public meetings.

The NRC has the following questions regarding the process that occurred during development and submission of the ICN for ITAAC 570.

1. Please discuss the Quality Release and Certificate of Conformance (Reference 1) and the Field Service Report (Reference 2) that are referenced in the ICN. Specifically, please identify:
 - a. the scope of work covered by each reference as it relates to ITAAC 570
 - b. the reference's role in completion of the ITAAC
 - c. the specific cables covered in each reference that relate to ITAAC 570
2. Reference 2 indicates that the IITAs had not been installed; please answer the following questions:
 - a. What was the basis for the ICN statements (quoted above) regarding the licensee performing an inspection that verified that the as-built cable assemblies were installed in accordance with installation specifications, design drawings, design specifications, and work package requirements?
 - b. What was the basis for the ICN not indicating that the IITAs had not been installed?
 - c. For this ICN, what process did the licensee use to ensure that the ICN was consistent with the underlying references? Is this the same process used for other ICNs?
3. The NRC understands that the ICN for ITAAC 570 relies on tests and inspections performed at other than the final location. Why did the ICN for ITAAC 570 not address the associated NEI 08-01 guidance in a manner similar to other ICNs (e.g., ML20115E455)?
4. What document verified the 38 CL-1E thermocouple cables within the in-core instrument thimble assemblies (IITAs) are encased in a protective sheath and demonstrated the acceptability of the sheath.
5. Reference 2 routes the in-core instrument (ICI) cables to the connector rack on the IHP cable bridge. Where are the connector boxes located at which point the CL 1E cables become separated from the non-CI 1E cables?

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