Sample Closure Letter: ABWR ITAAC 3.3 Item 1
(ASME Piping Design Criteria)

XX/YY/ZZZZ (Date)

To: NRC

From: {Name of Licensee}
{Site Name and Unit #(s)}
{Docket #(s)}

Subject: Completion of ABWR ITAAC 3.3 Item 1

The purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of {Site Name and Unit #(s)} Inspection, Test, Analysis and Acceptance Criteria (ITAAC) 3.3 Item 1, ASME Piping Design Criteria, in accordance with 10 CFR 52.99(c)(1). The closure process for this ITAAC is based on the guidance described in NEI-08-01 (Reference 1).

ITAAC Statement

Design Commitment

The piping system shall be designed to meet its ASME Code Class and Seismic Category I requirements.

The ASME Code Class 1, 2, and 3 piping system shall be designed to retain its pressure integrity and functional capability under internal design and operating pressures and design basis loads. Piping and piping components shall be designed to show compliance with the requirements of ASME Code Section III.

Inspection/Test/Analysis

Inspections of ASME Code required documents will be conducted.

Acceptance Criteria

An ASME Code Certified Stress Report exists for the piping system and concludes that the design complies with the requirements of ASME Code, Section III.

ITAAC Determination Basis

The ASME Code classifications of ABWR piping systems are defined in Section 3.2 of the Tier 2 material of the ABWR DCD. The piping systems and their ASME Code Certified Stress Reports are listed in Table 1 (attached). All Stress Reports are identified in the ITAAC closure package (Reference 2).

Inspection Procedure XYZ (Reference 3) documents the scope of review for each of the ASME Code Certified Stress Reports. The scope of review includes the following areas:

1. The piping system Design Specification in accordance with ASME Code Section III, Subsection NCA-3252, including loading definitions and load combinations.
2. Thermal Analysis, in accordance with ASME Code Section III, Appendix C-1200, and applicable Subsection NB, NC or ND.
3. Structural Analysis, in accordance with ASME Code Section III, Appendix C-1300, and applicable Subsection NB, NC or ND.
4. Fatigue Analysis for the Class 1 piping and for the Class 3 SRV discharge piping in the wetwell and the SRV quenchers, in accordance with ASME Code Section III, Appendix C-1400, and applicable Subsection NB, NC or ND.

Inspections of the ASME Code Certified Stress Reports listed in attached Table 1 verify that the design of each piping system complies with the requirements of ASME Code, Section III, 1989 Edition, in accordance with the certified design.

ITAAC-Related Construction Finding Review

In accordance with plant procedures for ITAAC close-out, {Licensee} performed a review of ITAAC-related construction findings and associated corrective actions. This review determined that X associated findings, listed below, have been identified.

1. {ITAAC-related construction finding #1}

2. {ITAAC-related construction finding #2}

3. {ITAAC-related construction finding #3}

The corrective actions for each finding have been completed and each finding closed. This review is documented in the close-out package for ITAAC 3.3 Item 1, (Reference 2), which is available for NRC review.

ITAAC Closure Statement

Based on the above information, {Licensee Name} hereby notifies the NRC that ITAAC 3.3 Item 1 was performed for {Site Name and Unit #(s)}, and that the prescribed acceptance criteria were met.

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

If there are any questions, please contact {Name of Contact Person for licensee} at {Telephone Number for Contact Person}.

Sincerely,

{Signature of Licensee Representative}
{Typed Name of Licensee Representative}
{Title of Licensee Representative}

References (available for NRC review)

1. NEI 08-01, ITAAC Close-out Process Guideline
2. ITAAC Close-out Package for ITAAC 3.3 Item 1
3. Inspection Procedure XYZ, “Review of ASME Code Certified Stress Reports”

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Table 1. ABWR Piping System ASME Code Design Summary

Piping System[(Note 1)]	ASME Code Class(es)[(Note 2)]	ASME Code Subsection(s)[(Note 3)]	Certified Stress Report(s)
Nuclear Boiler (includes MSL and FW systems, RPV head vent and main steam drains)	1, 2 and 3	NB, NC and ND	Stress Report A Stress Report B Stress Report C Stress Report D Stress Report E Stress Report F Stress Report G
Reactor Recirculation	2	NC	Stress Report H
Control Rod Drive (insert line)	2	NC	Stress Report I
Standby Liquid Control	1 and 2	NB and NC	Stress Report J Stress Report K
Residual Heat Removal	1 and 2	NB and NC	Stress Report L Stress Report M
High Pressure Core Flooder	1 and 2	NB and NC	Stress Report N Stress Report O
Leak Detection and Isolation (sample lines and isolation valves)	2	NC	Stress Report P
Reactor Core Isolation Cooling	1, 2 and 3	NB, NC and ND	Stress Report Q Stress Report R Stress Report S
Reactor Water Cleanup	1 and 3	NB and ND	Stress Report T Stress Report U
Fuel Pool Cooling and Cleanup (RHR piping for safety-related make-up and supplemental cooling)	3	ND	Stress Report V
Suppression Pool Cleanup	2	NC	Stress Report W
Radwaste (portions forming part of containment boundary)	2	NC	Stress Report X
Makeup Water (Purified) (portions forming part of containment boundary)	2	NC	Stress Report Y
Makeup Water (Condensate) (condensate header piping)	2	NC	Stress Report Z
Reactor Building Cooling Water	2 and 3	NC and ND	Stress Report AA Stress Report BB
HVAC Normal Cooling Water (portions forming part of containment boundary)	2	NC	Stress Report CC
HVAC Emergency Cooling Water	3	ND	Stress Report DD
Reactor Service Water (safety-related portions)	3	ND	Stress Report EE
Station Service Air (containment isolation)	2	NC	Stress Report FF
Instrument Air Service (containment isolation)	2	NC	Stress Report GG

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Piping System[Note 1]	ASME Code Class(es)[Note 2]	ASME Code Subsection(s)[Note 3]	Certified Stress Report(s)
High Pressure Nitrogen Gas Supply	2 and 3	NC and ND	Stress Report HH Stress Report II
Emergency Diesel Generator (including fuel oil, cooling water and lube oil piping)	3	ND	Stress Report JJ
Primary Containment (suppression chamber/drywell vacuum breakers)	2	NC	Stress Report KK
Atmospheric Control	2 and 3	NC and ND	Stress Report LL Stress Report MM
Diesel Generator Fuel Oil Storage and Transfer System	3	ND	Stress Report NN

Notes:

1. See Table 3.2-1 in the Tier 2 material in the DCD for Safety Class designations of specific portions of each system. Most systems also include Class N (non-safety, non-ASME Code) portions, which are not identified in this table.
2. Per Tables 3.2-2 and 3.2-3 in the Tier 2 material in the DCD, Safety Classes 1, 2 and 3 correspond to ASME Code Classes 1, 2 and 3. All three Safety Classes are Seismic Category 1.
3. Supports for all listed piping systems are designed in accordance with Subsection NF. The Subsection NCA requirements for Design Specifications and Design Reports Subsection NCA apply to all three ASME Classes.