

**225 Day Notification**  
**ITAAC-ABWR 2.14.4a Item 4a**

XX/YY/ZZZZ (Date)

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

**Subject: Notification of Uncompleted ABWR ITAAC 2.14.4a Item 4a**

**ITAAC Statement**

Design Commitment

*The SGTS (Standby Gas Treatment System) maintains a negative pressure of 6.35 mm water gauge or greater in the secondary containment relative to the outdoor atmosphere within 20 minutes when the secondary containment is isolated.*

Inspection/Test/Analysis

*Tests will be conducted on each as-built SGTS division.*

Acceptance Criteria

*The SGTS maintains a negative pressure of 6.35 mm water gauge or greater in the secondary containment relative to the outdoor atmosphere within 20 minutes when the secondary containment is isolated.*

**Actions Achieved Toward ITAAC Closure**

Progress as of (Month, Day, Year) toward completing this ITAAC is approximately 25% with the SGTS Negative Pressure Test Procedure XXX.XXX.XXX (Reference 1) and Negative Pressure Test Package (Reference 2) generated, but the test, associated inspection activities, and test analysis results remain to be completed. Completion of the test will be per the construction schedule. Test personnel have significant experience with Negative Pressure System test procedures, test packages, testing, inspections, and test result analysis. Completion of a successful test will confirm that SGTS maintains a negative pressure of 6.35 mm water gauge or greater in the secondary containment relative to the outdoor atmosphere within 20 minutes when the secondary containment is isolated.

The as-built divisions of the SGTS System identified within the secondary containment negative pressure test boundaries are established by the constructor based on plant design drawings and specifications. These design documents provide design and operating temperatures and pressures which allow assembly of the SGTS Negative Pressure Test Package per Procedure

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XXX.XXX.XXX, Negative Pressure Testing. Negative Pressure Testing personnel are trained in accordance with the Negative Pressure Testing Procedure, and test results are analyzed, documented, and retained. The Negative Pressure Test Package (Reference 2) consists of the following:

1. Negative Pressure Test Package Index Sheet
2. Negative Pressure Test Report
3. Drawing showing the SGTS system test boundary
4. Equipment List

The Negative Pressure Test Package documentation was prepared by the Negative Pressure Test Engineer, test rig and equipment set up was by the Negative Pressure Test Crew, inspection for leaks was by the Quality Inspector, and verification of test results documentation was by Quality Assurance.

**Actions Remaining to Attain ITAAC Closure**

Prior to final acceptance of the negative pressure test results of the SGTS System, a package documentation review will ensure compliance to 6.35 mm water gauge or greater in the secondary containment relative to the outdoor atmosphere within 20 minutes when the secondary containment is isolated. Any deviations identified will be resolved prior to system turnover to Start Up. The Negative Pressure Test Package documentation review by Quality Assurance will be per Quality Procedure XXX (Reference 3).

**ITAAC Closure Schedule**

ITAAC 2.14.4 Item 4a is being tracked in the ITAAC database. ITAAC 2.14.4 Item 4a Closeout Package (Reference 4) is scheduled to be issued by [month, day, year]. The Closure Letter for ITAAC 2.14.4 Item 4a will follow our review and acceptance of these documents.

Construction and Operations Negative Pressure Test programs are based upon procedures written and approved by Licensee (or their designee). Personnel performing the Negative Pressure Test are trained per the approved procedures. Such programs with appropriate third party inspections and documentation have been in use for industry outages for many years. These successful industry programs coupled with satisfactory negative pressure test results through (Month, Day, Year) showing completion of the major portions of this ITAAC at our facility provides confidence that [Licensee] will successfully complete this ITAAC.

**References** (available for NRC review)

- 1 Procedure XXX.XXX.XXX, Negative Pressure Testing
- 2 SGTS Negative Pressure Test Package (Initial Draft)
- 3 Quality Assurance Procedure XXX
- 4 ABWR ITAAC 2.14.4a Item 4a Closeout Package (Initial Draft)