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Scenarios And Their Respective ITAAC Closure Letters (ICLs)for Testing Flowchart for ITAAC Closure Verification Process

First Scenario: The NRC receives an initial ICL for open, non-targeted ITAAC 3.3.6, Item 7.d for the AP1000 design for the West Fargo Nuclear Plant Unit 1. The ICL does not have the appropriate format. What are the actions taken by the NRC and licensee?

Second Scenario: The NRC receives an initial ITAAC closure letter (ICL) for open, non-targeted ITAAC 3.3.6, Item 7.d for the AP1000 design for the West Fargo Nuclear Plant Unit 1. The ICL has the appropriate format and the required references. The NRC reviewed the ICL and determined that the determination basis of the ICL supported closure of the ITAAC. Only 60% of the targeted ITAAC in the same ITAAC family as non-targeted ITAAC 3.3.6, Item 7.d are closed. What are the actions taken by the NRC?

ITAAC CLOSURE LETTER FOR AP1000 ITAAC 3.3.6, ITEM 7D (SCENARIOS 1 AND 2)

01/02/2020

To: NRC
From: Piketon Nuclear Company
West Fargo Nuclear Plant Unit 1
Docket Number 52-601

Subject: Completion of ITAAC 3.3.6 item 7d

The purpose of this letter is to notify the NRC of the completion of West Fargo Nuclear Plant, Unit 1 Inspection, Test, Analysis and Acceptance Criteria (ITAAC) 3.3.6 item 7d for Cable Separation 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

ITAAC Table 3.3.6 (7d) Physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables

Inspection/Test/Analysis

Inspections of the as-built Class 1E raceways will be performed to confirm that the separation between Class 1E raceways of different divisions and between Class 1E raceways and non-Class 1E raceways is consistent with the following:

- Within the main control room and remote shutdown room, the minimum vertical separation is 3 inches and the minimum horizontal separation is 1 inch.
- Within other plant areas (limited hazard areas), the minimum separation is defined by one of the following:
  - The minimum vertical separation is 5 feet and the minimum horizontal separation is 3 feet.
  - The minimum vertical separation is 12 inches and the minimum horizontal separation is 6 inches for raceways containing only instrumentation and control and low-voltage power cables <2/0 AWG.
  - For configurations that involve exclusively limited energy content cables (instrumentation and control), the minimum vertical separation is 3 inches and the minimum horizontal separation is 1 inch.
  - For configurations involving an enclosed raceway and an open raceway, the minimum vertical separation is 1 inch if the enclosed raceway is below the open raceway.
  - For configuration involving enclosed raceways, the minimum separation is 1 inch in both horizontal and vertical directions.
- Where minimum separation distances are not maintained, the circuits are run in enclosed raceways or barriers are provided.
- Separation distances less than those specified above and not run in enclosed raceways or provided with barriers are based on analysis
- Non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is considered as associated circuits and subject to Class 1E requirements.

Acceptance Criteria

Results of the inspection will confirm that the separation between Class 1E raceways of different divisions and between Class 1E raceways and non-Class 1E raceways is consistent with the followings:

- Within the main control room and remote shutdown room, the vertical separation is 3 inches or more and the horizontal separation is 1 inch or more.
- Within other plant areas (limited hazard areas), the separation meets one of the following:
  - The vertical separation is 5 feet or more and the horizontal separation is 3 feet or more.
  - The minimum vertical separation is 12 inches and the minimum horizontal separation is 6 inches for raceways containing only instrumentation and control and low-voltage power cables <2/0 AWG.
  - For configurations that involve exclusively limited energy content cables (instrumentation and control), the minimum vertical separation is 3 inches and the minimum horizontal separation is 1 inch.
  - For configurations that involve an enclosed raceway and an open raceway, the minimum vertical separation is 1 inch if the enclosed raceway is below the raceway.
  - For configurations that involve enclosed raceways, the minimum vertical and horizontal separation is 1 inch.
- Where minimum separation distances are not met, the circuits are run in enclosed raceways or barriers are provided.
- A report exists and concludes that separation distances less than those specified above and not provided with enclosed raceways or barriers have been analyzed.
- Non-Class 1E wiring that is not separated from Class 1E or associated wiring by the minimum separation distance or by a barrier or analyzed is treated as Class 1E wiring.

ITAAC Determination Basis

Inspections and analysis of plant components have been performed to ensure that “physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables”.
The cable raceway system layout was designed using a three dimensional computer model. The raceways were routed through the model plant within an appropriate space reservation envelope to ensure that no violations of the separation requirements would occur. Construction drawings and Installation Specifications provided to the

installer identified separation criteria, consistent with the ITAAC commitment, that were required to be met during erection activities.

Piketon Corporation installed the cable raceway in accordance with the “Released For Construction” drawings and the Installation Specifications. These components were presented for inspection by Quality Control as appropriate portions of the work completed. Independent verification of the Class 1E raceway installation by the Quality Control Group included inspection of the separation criteria attributes identified in “Released For Construction” drawings and the Installation Specifications and was recorded in the inspection report. The completed raceway tickets for the satisfactorily installed and inspected raceways were turned in and recorded in the site’s Electrical Raceway and Cable Tracking System.

Raceway completion and cable route was validated by Quality Control walk-down of the designated raceways prior to pulling Class 1E cables. Any deviations were documented and resolved prior to cable pull. The completed cable pull tickets for the satisfactorily installed and inspected cables were turned in and recorded in the site’s Electrical Raceway and Cable Tracking System. Cable training within cabinets was independently verified by Quality Control for separation attributes through a series of documented inspections as cables were installed and terminated. The completed termination tickets for the satisfactorily installed and inspected cables were turned in and recorded in the site’s Electrical Raceway and Cable Tracking System.

Prior to final acceptance of the overall Class 1E raceway and cable system Engineering and Quality Control performed a walk-down of the plant Class 1E electrical components to identify any potential violations of the required cable separation criteria. Any deviations were identified, recorded, dispositioned, and resolved prior to issuing the Final Report. The walk-down was performed in accordance with the site Cable Separation Final Walk-down Procedure (Reference 2).

Review of the inspection reports, the site’s Electrical Raceway and Cable Tracking System, Design Change documents, Nonconformance Reports, and the Final Report concludes that the cable installed in the plant has been inspected and reviewed to ensure that the required physical separation between cables from different Class 1E divisions and between Class 1E cables and non-Class 1E cables has been achieved. All exceptions to the separation criteria identified in the installation specification and the project drawings have been identified by Design Change documents or Nonconformance Reports. These exceptions whether identified during installation or by final walk down of the as built configuration have been evaluated and corrected, mitigated, or accepted as is.

The Cable Separation Final Report concludes that separation distances are satisfactory. Those separation distances less than specified by the ITAAC criteria and not provided with enclosed raceways or barriers have been analyzed and determined to be satisfactory. The Cable Separation Final Report (Reference 3) is available for NRC review at the West Fargo Nuclear Plant, Unit 1 site.

ITAAC Related Construction Finding Review

In accordance with plant procedures for ITAAC close-out, Piketon Nuclear Company performed a review of ITAAC-related construction findings and associated corrective actions. This review determined that two such findings, listed below, have been identified.

1. {ITAAC-related construction finding #1}
2. {ITAAC-related construction finding #2}

The corrective actions for each finding have been completed and each finding closed. This review is documented in the close-out package for ITAAC 3.3.6 item 7d (Reference 4), which is available for NRC review. NRC closure of these findings is available on the Construction Inspection Program Information Management System (CIPIMS) portion of the NRC website for this docket and may be located by referencing the NRC finding numbers provided above.

ITAAC Closure Statement

Based on the above information, Piketon Nuclear Company hereby notifies the NRC that ITAAC 3.3.6 item 7d has been reviewed and the installation achieves the prescribed acceptance criteria. 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 Marion Davies at 1-344-456-2367.

Sincerely,
Jonathan Andrews,
Vice President of Nuclear Operations, West Fargo Nuclear Plant, Unit 1
Piketon Nuclear Company
West Fargo, North Dakota 84428

References (available for NRC review)

1. NEI 08-01, Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52
2. Cable Separation Final Walk-down Procedure
3. ITAAC 3.3.6 item 7d Cable Separation Final Report, Revision 0
4. ITAAC 3.3.6 item 7d Closeout Package

Third Scenario: The NRC receives an initial ICL for open, non-targeted ITAAC 2.5.2.8, Item 10 for the AP1000 design for the West Fargo Nuclear Plant Unit 1. The ICL has the appropriate format and the required references. The NRC reviewed the ICL and determined that the determination basis of the ICL supported closure of the ITAAC. 70% of the targeted ITAAC in the same ITAAC family as non-targeted ITAAC 2.5.2.8, Item 10 are closed. What are the actions taken by the NRC?

Fourth Scenario: The NRC receives an initial ICL for open, non-targeted ITAAC 2.5.2.8, Item 10 for the AP1000 design for the West Fargo Nuclear Plant Unit 1. The ICL has the appropriate format and the required references. 70% of the targeted ITAAC in the same ITAAC family as non-targeted ITAAC 2.5.2.8, Item 10 are closed. The NRC technical staff discovered during a prior review of the licensee's methodology for calculating instrument setpoints and uncertainties that there was concern with the licensee's Procedure 400 which is Reference 2 in this ICL. The technical staff had alerted the licensee that their Procedure 400 did not conform to the guidelines for calculating instrument setpoints and uncertainties in accordance with the noted industry standard referenced in its Procedure 400. The technical staff and the licensee had agreed upon the necessary corrective actions which involved actual changes to the setpoints in a number of Protection and Safety Monitoring System (PMS) circuits. During the closure review of this ITAAC, the Technical Staff had requested a copy of Procedure 400 and of the setpoints for the PMS, and the staff determined that the licensee had not changed Procedure 400 or made actual changes to the PMS setpoints as requested by the staff. What are the actions taken by the NRC and licensee?

ITAAC CLOSURE LETTER FOR AP1000 ITAAC 2.5.2-8, ITEM 10 (SCENARIOS 3 AND 4)

06/02/2021

To: NRC
From: Piketon Nuclear Company
West Fargo Nuclear Plant Unit 1
Docket Number 52-601

Subject: Completion of ITAAC 2.5.2-8 Item10

The purpose of this letter is to notify Nuclear Regulatory Commission (NRC) of the completion of West Fargo Nuclear Plant, Unit 1 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) 2.5.2-8 item 10 for the Protection and Safety Monitoring System (PMS), 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

Setpoints are determined using a methodology which accounts for loop inaccuracies, response testing, and maintenance or replacement of instrumentation.

Inspection/Test/Analysis

Inspection will be performed for a document that describes the methodology and input parameters used to determine the PMS setpoints.

Acceptance Criteria

A report exists and concludes that the PMS setpoints are determined using a methodology which accounts for loop inaccuracies, response testing, and maintenance or replacement of instrumentation.

ITAAC Determination Basis

Instrument setpoints for permanently installed instrumentation are determined using methodology specified in Procedure 400, *Instrument Uncertainty and Setpoint Calculation Guidelines* (Reference 2). This methodology accounts for loop inaccuracies, response testing, and maintenance or replacement of instrumentation.

Piketon Nuclear Company performed an inspection of Engineering Report 205, *Setpoint Determination for the Protection and Safety Monitoring System* (Reference 3), which established the setpoints for the PMS system. The purpose of the inspection was to confirm that the PMS setpoints were determined using Reference 1 and that the procedure specifies a methodology that takes into account instrument loop uncertainties and inaccuracies,

response testing results, and maintenance or replacement activities. This inspection is documented in Inspection Report QA-101, *Closure of ITAAC 2.5.2-8, Item 10* (Reference 4).

The inspection determined that References 1 and 2 were used for the PMS setpoints and that Reference 1 provides specific instructions for calculating instrument and loop uncertainty setpoints. The input parameters for the calculation include instrument and loop uncertainties and inaccuracies, response testing results, and maintenance or replacement activities.

Therefore, Inspection Report QA-101(Reference 4) exists and concludes that the PMS setpoints are determined using a methodology which accounts for loop inaccuracies, response testing, and maintenance or replacement of instrumentation.

ITAAC-Related Construction Finding Review

In accordance with plant procedures for ITAAC close-out, Piketon Nuclear Company performed a review of ITAAC-related construction findings and associated corrective actions. This review determined that three 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 2.5.2-8, Item 10 (Reference 5), which is available for NRC review. NRC closure of these findings is available on the Construction Inspection Program Information Management System (CIPIMS) portion of the NRC website for this docket and may be located by referencing the NRC finding numbers provided above.

ITAAC Closure Statement

Based on the above information, Piketon Nuclear Company hereby notifies the NRC that Piketon Nuclear Company has performed ITAAC 2.5.2-8, Item 10 for West Fargo Nuclear Plant, Unit 1 and that the prescribed acceptance criteria were met.

Piketon Nuclear Company requests 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 Marion Davies at 1-344-456-2367.

Sincerely,
Jonathan Andrews,
Vice President of Nuclear Operations, West Fargo Nuclear Plant, Unit 1
Piketon Nuclear Company
West Fargo, North Dakota 84428

References (available for NRC review)

1. NEI 08-01, Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52
2. Procedure 400, Instrument Uncertainty and Setpoint Calculation Guidelines
3. Engineering Report 205, Setpoint Determination for the Protection and Safety Monitoring System
4. Inspection Report QA-101, Closure of ITAAC 2.5.2-8 item10
5. ITAAC 2.5.2-8 item 10 Close-Out Package

Fifth Scenario: The NRC receives a supplemental ICL for closed, non-targeted ITAAC 2.1.2-3, Item 11 for the ESBWR design for the Shoretime Nuclear Plant Unit 1. The ICL has the appropriate format and the required references. The licensee submitted the supplemental letter because the inboard isolation check valve V12 for Feedwater Line A in the Nuclear Boiler System (NBS) was replaced by another identical valve which was tested at plant conditions that were different from those required by the ITAAC. The licensee performed an engineering reanalysis and a test which confirmed the integrity of the new valve at the present plant conditions and that the ITAAC acceptance criterion was met. However, the new test did not mimic the original test required by ITAAC 2.1.2-3, Item 11, and a supplemental letter was required. The licensee maintains that ITAAC 2.1.2-3, Item 11 should remain closed. What are the actions taken by the licensee and the NRC?

SUPPLEMENTAL ITAAC CLOSURE LETTER FOR AP1000 ITAAC 2.1.2-3, ITEM 11 (SCENARIO 5)

06/02/2022

To: NRC
From: Kellogg Nuclear Company
Shoretime Nuclear Plant Unit 1
Docket Number 52-714

Subject: Supplement for ESBWR ITAAC 2.1.2-3, ITEM 11 Completion

The purpose of this letter is to provide the Nuclear Regulatory Commission (NRC) with supplemental information regarding the completion status of Shoretime Nuclear Plant (SNP), Unit 1 Inspection, Tests, Analyses, and Acceptance Criteria (ITAAC) 2.1.2-3, item 11 for the Nuclear Boiler System (NBS). This notification is being provided in accordance with 10 CFR 52.99(c)(3)(i),and in NEI 08-01 (Reference 1).

Reason for Supplement

Additional actions were required to restore the completed status of ITAAC 2.1.2-3 item 11 following the submittal of ITAAC Closure Letter {SNP-001 on dated 3/12/2020 at ADAMS ML097865436} (Reference 6) due to the

replacement of damaged isolation check valve V12 for Feedwater Line A for the Nuclear Boiler System (NBS) with another identical valve. The new valve could not be tested at preoperational conditions as required by the ITAAC and was tested at significantly different plant conditions. Therefore, a supplemental letter was required. An engineering analysis verified that the new valve meets the original ITAAC acceptance criteria, and the licensee maintains ITAAC 2.1.2-3 is still closed.

ITAAC Statement

Design Commitment
Check valves listed in Table 2.1.2-1 open and close under system pressure, fluid flow, and temperature conditions.

Inspection/Test/Analysis
Tests of installed valves for opening and closing will be conducted under system preoperational pressure, fluid flow, and temperature conditions.

Acceptance Criteria
Based on the direction of the differential pressure across the valve, each check valve listed in Table 2.1.2-1 opens and closes.

Supplemental ITAAC Determination Basis

After the original closure of ITAAC 2.1.2-3 item 11, Field Change 0123456 (Reference 2) was performed to replace damaged feedwater inboard isolation check valve V12 for Feedwater Line A for the NBS as shown on plant drawing SNP-PID-012 (Reference 3) with another identical valve. SNP staff could not test the new valve at the preoperational conditions required by the ITAAC. Therefore, the valve was tested at significantly different plant conditions. The test and an engineering analysis SNP-CALC-012 (Reference 4) were performed to verify the integrity of the valve at present plant conditions, and that the ITAAC acceptance criterion was met. A test report SNP-TEST-012 (Reference 5) validates performance of the required test for ITAAC 2.1.2-3, Item 11. Completion Package (Reference 7) has been updated to include this additional testing. This maintains the completed status of ITAAC 2.1.2-3, Item 11.

Associated ITAAC Findings

There were no ITAAC Findings related to this ITAAC Supplemental Closure Letter.

ITAAC Completion Maintained Statement

Based on the above information, Kellogg Nuclear Company hereby notifies the NRC that Kellogg Nuclear Company has performed ITAAC 2.5.2-8, Item 10 for Shoretime Nuclear Plant, Unit 1 and that the prescribed acceptance criteria were met.

If there are any questions, please contact Donald Cook at 1-744-456-2367.

Sincerely,
Alexander Smith,
Vice President of Nuclear Operations, Shoretime Nuclear Plant, Unit 1
Kellogg Nuclear Company
Compton, Texas 53428

References

1. NEI 08-01, Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52
2. Field Change 0123456, Like for Like Replacement of Feedwater Inboard Isolation Check Valve V12
3. Piping and Instrument (P&ID) drawing SNP-PID-012, Nuclear Boiler System
4. Engineering Analysis SNP-CALC-012, Verification of Functionality of Check Valve V12 at Startup Test Conditions
5. Test Report SNP-TEST-012, Test of Check Valve V12 for ITAAC 2.1.2-3, Item 11
6. Original ITAAC Closure Letter {SNP-001 dated 3/12/2020 at ADAMS ML097865436}
7. ITAAC 2.1.2-3, Item 11 Completion Package

Sixth Scenario: The NRC receives a supplemental ICL for closed, targeted ITAAC 2.4.2-5, Item 6b and ITAAC 2.4.4-5, Item 4b for US-APWR design for Lakeland Nuclear Plant Unit 1. The ICL has the appropriate format and the required references. The licensee submitted the supplemental letter because it was determined that the initial ICL was not correct. Eastern Ohio Power Company, the licensee, determined that the initial hydrostatic test of the reactor coolant system (RCS) piping was not conducted in accordance with ASME Section III, Article NB-6200 for class 1 piping because the required test pressure of 125% of system design pressure was never achieved. The licensee discovered this error during the recalibration of the test instrumentation used during that initial hydrostatic test. The licensee notified the Headquarters Operation Center (HOO) in accordance with 10 CFR 52.99(c)(3)(i) of the error and the impact on the targeted ITAAC and also reported this deviation to the NRC under 10 CFR 50.55(e)(3)(ii). As the result of a root cause investigation, the licensee discovered that not only had the RCS piping been tested with the faulty instrumentation, but also the Emergency Core Cooling System (ECCS) piping had been hydrostatically tested with that same instrumentation. That meant that the closure of ITAAC 2.4.4-5, Item 4b was also affected. The licensee informed the NRC in a similar manner as it did for ITAAC 2.4.2-5, Item 6b about the impact on the closure of ITAAC 2.4.4-5, Item 4b. The licensee commenced corrective actions by modifying its test procedures to ensure more control of test instrumentation and commencing immediate hydrostatic testing of both the RCS and ECCS piping using newly calibrated test instrumentation that was verified by two independent parties as being calibrated correctly. The licensee satisfactorily tested the RCS and ECCS piping at 125% of their respective system design pressures, modified the closure packages of ITAAC 2.4.2-5, Item 6b and ITAAC 2.4.4-5, Item 4b, and submitted a supplemental to the NRC to address the closure of both of those ITAAC. What are the actions taken by the licensee and the NRC?

SUPPLEMENTAL ITAAC CLOSURE LETTER FOR AP1000 ITAAC 2.4.2-5, ITEM 6b and ITAAC 2.4.4-5, ITEM 4b (SCENARIO 6)

07/06/2025

To: NRC
From: Eastern Ohio Power Company
Lakeland Nuclear Plant Unit 1
Docket Number 52-863

Subject: Supplement for US-APWR ITAAC 2.4.2-5, Item 6b and ITAAC 2.4.4-5, Item 4b Completion

The purpose of this letter is to provide the Nuclear Regulatory Commission (NRC) with supplemental information regarding the completion status of Lakeland Nuclear Plant (LNP), Unit 1 Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) 2.4.2-5, item 6b for the Reactor Coolant System (RCS) and ITAAC 2.4.4-5, Item 4b for the Emergency Core Cooling System (ECCS).. This notification is being provided in accordance with 10 CFR 52.99(c)(3)(i),and in NEI 08-01 (Reference 1).

Reason for Supplement

Additional actions were required to restore the completed status of ITAAC 2.4.2-5, item 6b for the RCS and ITAAC 2.4.4-5, Item 4b for the ECCS following the submittal of their ITAAC Closure Letters {LNP-011 dated 4/22/2023 at ADAMS ML099678436 and LNP-023 dated 5/17/2024 at ADAMS ML099995674} (References 6 and 7) because the piping for both the RCS and ECCS had been hydrostatically tested at below the required test pressure. The NRC issued an ITAAC finding, and LNP staff commenced the appropriate corrective actions including hydrostatic testing of both the RCS and ECCS piping at the correct pressures. This supplemental letter is being submitted to indicate the corrective actions undertaken to maintain ITAAC 2.4.2-5, Item 6b and ITAAC 2.4.4-5, Item 4b in a closed state.

ITAAC Statement
Design Commitment
The ASME Code Section III piping, identified in Table 2.4.2-3, retains its pressure boundary integrity at its design pressure.

Inspection/Test/Analysis
A hydrostatic test will be performed on the as-built piping required by the ASME Code Section III to be hydrostatically tested.

Acceptance Criteria
The results of the hydrostatic test of the as-built piping identified in Table 2.4.2-3 as ASME Code Section III conform to the requirements of the ASME Code Section III.

Supplemental ITAAC Determination Basis

After the original closure of ITAAC 2.4.2-5, Item 6b, it was determined that the initial hydrostatic test of the reactor coolant system (RCS) piping was not conducted in accordance with ASME Section III, Article NB-6200 for class 1 piping because the required test pressure of 125% of system design pressure was never achieved. The licensee discovered this error during the recalibration of the test instrumentation used during that initial hydrostatic test. The licensee also reported this deviation to the NRC under 10 CFR 50.55(e)(3)(ii) in Deviation Report LNP-DR-012 (Reference 2). As the result of a root cause investigation, the licensee discovered that not only had the RCS piping been tested with the faulty instrumentation, but also the Emergency Core Cooling System (ECCS) piping had been hydrostatically tested with that same instrumentation. That meant that the closure of ITAAC 2.4.4-5, Item 4b was also affected. The licensee commenced corrective actions by modifying its test procedures to ensure more control of test instrumentation and conducting hydrostatic testing of both the RCS and ECCS piping using Test Procedure LNP-TP-067 (Reference 5) and newly calibrated test instrumentation that was verified by two independent parties as being calibrated correctly. The licensee satisfactorily tested the RCS and ECCS piping at 125% of their respective system design pressures, modified the closure packages of ITAAC 2.4.2-5, Item 6b and ITAAC 2.4.4-5, Item 4b, and submitted this supplemental ICL to the NRC to address the closure of both of those ITAAC.

Associated ITAAC Findings

In accordance with plant procedures for ITAAC close-out, Eastern Ohio Power Company performed a review of the ITAAC findings and associated corrective actions. This review determined that one such finding, listed below, has been identified.

{ITAAC finding - NRC-IF-098}

The corrective actions for this finding have been completed and it was closed. This review is documented in the close-out packages for ITAAC 2.4.2-5, Item 6b and ITAAC 2.4.4-5, Item 4b (References 8 and 9), which are available for NRC review. NRC closure of this finding is available on the Construction Inspection Program Information Management System (CIPIMS) portion of the NRC website for this docket and may be located by referencing the NRC finding numbers provided above.

ITAAC Completion Maintained Statement

Based on the above information, Eastern Ohio Power Company hereby notifies the NRC that Lakeland Nuclear Company has performed ITAAC 2.4.2-5, Item 6b and ITAAC 2.4.4-5, Item 4b for Lakeland Nuclear Plant, Unit 1 and that the prescribed acceptance criteria were met.

If there are any questions, please contact Theodore Whiting at 1-987-476-2367.

Sincerely,
Thomas King
Vice President of Nuclear Operations, Lakeland Nuclear Plant, Unit 1
Eastern Ohio Power Company
South Wales, Ohio 44449

References

1. NEI 08-01, Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52
2. Deviation Report LNP-DR-012 for RCS dated 04/06/2025
3. Engineering Evaluation LNP-CALC-033, Functionality of the RCS Piping
4 Root cause investigation LNP-RCI-089, Determine Reasons for Improper Testing of RCS
5. Test Procedure LNP-TP-067, Hydrostatic Test of Classes 1, 2, and 3 piping
6. Original ITAAC Closure Letters for ITAAC 2.4.2-5, Item 6b {LNP-011 dated 4/22/2023 at ADAMS ML099678436
7. Original ITAAC Closure Letters for ITAAC 2.4.4-5, Item 4b {LNP-023 dated 5/17/2024 at ADAMS ML09
8. ITAAC 2.4.2-5, Item 6b Completion Package
9. ITAAC 2.4.4-5, Item 4b Completion Package