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**MAY 27 2016**

ND-16-0789  
10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555-0001

Southern Nuclear Operating Company  
Vogtle Electric Generating Plant Unit 3  
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of May 27, 2016, Vogtle Electric Generating Plant Unit 3 Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) items listed in Enclosure 1 have not been completed greater than 225-days prior to initial fuel load. With this letter, Southern Nuclear Operating Company is providing a partial set of notifications for ITAAC that have not been completed greater than 225-days prior to initial fuel load. Enclosure 2 describes the plans for completing each ITAAC listed in Enclosure 1. Southern Nuclear Operating Company will at a later date provide additional notifications for ITAAC that have not been completed 225-days prior to initial fuel load.

This notification is informed by the guidance described in 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. In accordance with NEI 08-01, this notification includes ITAAC for which required inspections, tests, or analyses have not been performed or have been only partially completed. All ITAAC will be fully completed and all Section 52.99(c)(1) ITAAC Closure Notifications will be submitted to NRC to support the Commission finding that all acceptance criteria are met prior to plant operation, as required by 10 CFR 52.103(g).

This letter contains no new NRC regulatory commitments.

If there are any questions, please contact David Woods at 706-848-5531.

Respectfully submitted,

Michael J. Yox  
Regulatory Affairs Director Vogtle 3&4

U.S. Nuclear Regulatory Commission

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MJY/KMS/amm

**Enclosures:**

1. List of Uncompleted ITAAC Items as of 05/27/16
2. Completion Plans for Uncompleted ITAAC Items Listed in Enclosure 1

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ND-16-0789  
Enclosure 1  
Uncompleted ITAAC

**Southern Nuclear Operating Company**

**ND-16-0789**

**Enclosure 1**

**Vogtle Electric Generating Plant (VEGP) Unit 3**

**List of Uncompleted ITAAC Items as of 05/27/16**

<b>COL Index No.</b>	<b>Subject</b>	<b>Page No.</b>
25	Uncompleted ITAAC 2.1.02.07a.ii	2
27	Uncompleted ITAAC 2.1.02.07c	7
36	Uncompleted ITAAC 2.1.02.08d.v	9
37	Uncompleted ITAAC 2.1.02.08d.vi	11
69	Uncompleted ITAAC 2.1.03.02a	12
72	Uncompleted ITAAC 2.1.03.03	15
75	Uncompleted ITAAC 2.1.03.06.i	18
84	Uncompleted ITAAC 2.1.03.09c	22
104	Uncompleted ITAAC 2.2.01.06c	24
120	Uncompleted ITAAC 2.2.02.02a	26
134	Uncompleted ITAAC 2.2.02.06c	29
173	Uncompleted ITAAC 2.2.03.07c	31
204	Uncompleted ITAAC 2.2.03.09b	33
220	Uncompleted ITAAC 2.2.04.02a	35
234	Uncompleted ITAAC 2.2.04.07c	38
237	Uncompleted ITAAC 2.2.04.08b.i	40
264	Uncompleted ITAAC 2.2.05.06b	42
285	Uncompleted ITAAC 2.3.02.02a	44
291	Uncompleted ITAAC 2.3.02.05.i	47
297	Uncompleted ITAAC 2.3.02.06c	51
299	Uncompleted ITAAC 2.3.02.07b	53
300	Uncompleted ITAAC 2.3.02.07c	55
369	Uncompleted ITAAC 2.3.06.07c	57
400	Uncompleted ITAAC 2.3.07.06b	59
431	Uncompleted ITAAC 2.3.10.02a	61
468	Uncompleted ITAAC 2.3.13.06c	64
485	Uncompleted ITAAC 2.3.19.01b	66
528	Uncompleted ITAAC 2.5.02.05b	67
571	Uncompleted ITAAC 2.5.05.03c	69
583	Uncompleted ITAAC 2.6.01.03b	71
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632	Uncompleted ITAAC 2.6.05.04	75
678	Uncompleted ITAAC 2.7.01.02a	77
688	Uncompleted ITAAC 2.7.01.06b	80
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<b>COL Index No.</b>	<b>Subject</b>	<b>Page No.</b>
691	Uncompleted ITAAC 2.7.01.08b	84
692	Uncompleted ITAAC 2.7.01.08c	86
728	Uncompleted ITAAC 2.7.06.03iii	88
828	Uncompleted ITAAC 3.5.00.03	90
834	Uncompleted ITAAC 3.6.00.01.i	92
835	Uncompleted ITAAC 3.6.00.01.ii	94
836	Uncompleted ITAAC 3.6.00.01.iii	96
837	Uncompleted ITAAC 3.6.00.01.iv	98
838	Uncompleted ITAAC 3.6.00.01.v	100
839	Uncompleted ITAAC 3.6.00.01.vi	102
840	Uncompleted ITAAC 3.6.00.01.vii	104
862	Uncompleted ITAAC E.3.9.06.00.04	106
865	Uncompleted ITAAC E.3.9.07.01.01	108
866	Uncompleted ITAAC E.3.9.07.01.02	110
867	Uncompleted ITAAC E.3.9.07.01.03	112
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869	Uncompleted ITAAC E.3.9.07.01.05	116
872	Uncompleted ITAAC E.3.9.08.01.03	118

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Enclosure 2  
Completion Plans

**Southern Nuclear Operating Company**

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**Enclosure 2**

**Vogtle Electric Generating Plant (VEGP) Unit 3**

**Completion Plans for Uncompleted ITAAC  
Items Listed in Enclosure 1**



**Subject: Uncompleted ITAAC 2.1.02.07a.ii [Index No. 25]**

## **ITAAC Statement**

### **Design Commitment**

- 7.a) *The Class 1E equipment identified in Table 2.1.2-1 as being qualified for a harsh environment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of safety function for the time required to perform the safety function.*

### **Inspections/Tests/Analyses**

- ii) *Inspection will be performed of the as-built Class 1E equipment and the associated wiring, cables, and terminations located in a harsh environment.*

### **Acceptance Criteria**

- ii) *A report exists and concludes that the as-built Class 1E equipment and the associated wiring, cables, and terminations identified in Table 2.1.2-1 as being qualified for a harsh environment are bounded by type tests, analyses, or a combination of type tests and analyses.*

## **ITAAC Completion Description**

Multiple ITAAC are performed to demonstrate that the Class 1E equipment identified in VEGP Unit 3 Combined License (COL) Appendix C Table 2.1.2-1 (Attachment A) as being qualified for a harsh environment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of safety function for the time required to perform the safety function. The subject ITAAC requires an inspection be performed of the as-built Class 1E equipment and the associated wiring, cables, and terminations located in a harsh environment.

Harsh environment qualification of the components in VEGP Unit 3 COL Appendix C Table 2.1.2-1 is verified by type tests, analyses or a combination of type tests and analyses in accordance with ITAAC 2.1.02.07a.i (Reference 1). Equipment Qualification Data Packages (EQDP) and Equipment Qualification Summary Reports (EQSR) identify the equipment mounting employed for qualification and the environmental conditions tested or analyzed.

In accordance with Equipment Qualification (EQ) Walkdown Inspection Procedure XYZ (Reference 2), an inspection is conducted of the Reactor Coolant System (RCS) to confirm the satisfactory installation of the Class 1E components. The inspection includes verification of equipment make/model/serial number; verification of the equipment mounting, wiring, cables, and terminations; and verification of equipment location to confirm that the harsh environmental conditions for the room in which the component is mounted are bounded by the tested or analyzed conditions.

The documentation of installed configuration of harsh environment qualified components includes photographs and/or sketches of equipment mounting and connections. The verification of installed component configuration is documented in the EQ As-Built Reconciliation Report(s) (Reference 3).

Attachment A identifies the EQ As-Built Reconciliation Report(s) which verify that the installed configuration of the Class 1E equipment identified in VEGP Unit 3 COL Appendix C Table 2.1.2-1 including the associated wiring, cables, and terminations are bounded by the qualified configuration and IEEE Standard 323-1974 (Reference 4). The EQ As-Built Reconciliation Reports are available for NRC inspection as part of the ITAAC Completion Package (Reference 5).

### **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

### **References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.1.02.07a.i [Index No. 24]
2. EQ Walkdown Inspection Procedure XYZ
3. EQ As-Built Reconciliation Report(s) as identified in Attachment A
4. IEEE Standard 323-1974, "IEEE Standard for Qualifying Class 1E Equipment for Nuclear Power Generating Stations"
5. ITAAC 2.1.02.07a.ii Completion Package
6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A: Excerpt from COL Appendix C Table 2.1.2-1

ITAAC COMPLIANCE MATRIX FOR HARSH ENVIRONMENT  
QUALIFIED EQUIPMENT  
(REACTOR COOLANT SYSTEM)

Table 2.1.2-1			
Equipment Name	Tag No.	Class 1E/Qual. for Harsh Envir.	EQ Reconciliation Report Number
First-stage ADS Motor-operated Valve (MOV)	RCS-PL-V001A	Yes/Yes	XXX
First-stage ADS MOV	RCS-PL-V001B	Yes/Yes	XXX
Second-stage ADS MOV	RCS-PL-V002A	Yes/Yes	XXX
Second-stage ADS MOV	RCS-PL-V002B	Yes/Yes	XXX
Third-stage ADS MOV	RCS-PL-V003A	Yes/Yes	XXX
Third-stage ADS MOV	RCS-PL-V003B	Yes/Yes	XXX
Fourth-stage ADS Squib Valve	RCS-PL-V004A	Yes/Yes	XXX
Fourth-stage ADS Squib Valve	RCS-PL-V004B	Yes/Yes	XXX
Fourth-stage ADS Squib Valve	RCS-PL-V004C	Yes/Yes	XXX
Fourth-stage ADS Squib Valve	RCS-PL-V004D	Yes/Yes	XXX
ADS Discharge Header A Vacuum Relief Valve	RCS-PL-V010A	Yes/Yes	XXX
ADS Discharge Header B Vacuum Relief Valve	RCS-PL-V010B	Yes/Yes	XXX
First-stage ADS Isolation MOV	RCS-PL-V011A	Yes/Yes	XXX
First-stage ADS Isolation MOV	RCS-PL-V011B	Yes/Yes	XXX
Second-stage ADS Isolation MOV	RCS-PL-V012A	Yes/Yes	XXX
Second-stage ADS Isolation MOV	RCS-PL-V012B	Yes/Yes	XXX
Third-stage ADS Isolation MOV	RCS-PL-V013A	Yes/Yes	XXX
Third-stage ADS Isolation MOV	RCS-PL-V013B	Yes/Yes	XXX
Fourth-stage ADS MOV	RCS-PL-V014A	Yes/Yes	XXX
Fourth-stage ADS MOV	RCS-PL-V014B	Yes/Yes	XXX
Fourth-stage ADS MOV	RCS-PL-V014C	Yes/Yes	XXX
Fourth-stage ADS MOV	RCS-PL-V014D	Yes/Yes	XXX
Reactor Vessel Head Vent Valve	RCS-PL-V150A	Yes/Yes	XXX
Reactor Vessel Head Vent Valve	RCS-PL-V150B	Yes/Yes	XXX
Reactor Vessel Head Vent Valve	RCS-PL-V150C	Yes/Yes	XXX
Reactor Vessel Head Vent Valve	RCS-PL-V150D	Yes/Yes	XXX
RCS Cold Leg 1A Narrow Range Temperature Sensor	RCS-121A	Yes/Yes	XXX
RCS Cold Leg 1B Narrow Range Temperature Sensor	RCS-121B	Yes/Yes	XXX
RCS Cold Leg 1B Narrow Range Temperature Sensor	RCS-121C	Yes/Yes	XXX
RCS Cold Leg 1A Narrow Range Temperature Sensor	RCS-121D	Yes/Yes	XXX
RCS Cold Leg 2B Narrow Range Temperature Sensor	RCS-122A	Yes/Yes	XXX
RCS Cold Leg 2A Narrow Range Temperature Sensor	RCS-122B	Yes/Yes	XXX
RCS Cold Leg 2A Narrow Range Temperature Sensor	RCS-122C	Yes/Yes	XXX

Table 2.1.2-1			
Equipment Name	Tag No.	Class 1E/Qual. for Harsh Envir.	EQ Reconciliation Report Number
RCS Cold Leg 2B Narrow Range Temperature Sensor	RCS-122D	Yes/Yes	XXX
RCS Cold Leg 1A Dual Range Temperature Sensor	RCS-125A	Yes/Yes	XXX
RCS Cold Leg 2A Dual Range Temperature Sensor	RCS-125B	Yes/Yes	XXX
RCS Cold Leg 1B Dual Range Temperature Sensor	RCS-125C	Yes/Yes	XXX
RCS Cold Leg 2B Dual Range Temperature Sensor	RCS-125D	Yes/Yes	XXX
RCS Hot Leg 1 Narrow Range Temperature Sensor	RCS-131A	Yes/Yes	XXX
RCS Hot Leg 2 Narrow Range Temperature Sensor	RCS-131B	Yes/Yes	XXX
RCS Hot Leg 1 Narrow Range Temperature Sensor	RCS-131C	Yes/Yes	XXX
RCS Hot Leg 2 Narrow Range Temperature Sensor	RCS-131D	Yes/Yes	XXX
RCS Hot Leg 1 Narrow Range Temperature Sensor	RCS-132A	Yes/Yes	XXX
RCS Hot Leg 2 Narrow Range Temperature Sensor	RCS-132B	Yes/Yes	XXX
RCS Hot Leg 1 Narrow Range Temperature Sensor	RCS-132C	Yes/Yes	XXX
RCS Hot Leg 2 Narrow Range Temperature Sensor	RCS-132D	Yes/Yes	XXX
RCS Hot Leg 1 Narrow Range Temperature Sensor	RCS-133A	Yes/Yes	XXX
RCS Hot Leg 2 Narrow Range Temperature Sensor	RCS-133B	Yes/Yes	XXX
RCS Hot Leg 1 Narrow Range Temperature Sensor	RCS-133C	Yes/Yes	XXX
RCS Hot Leg 2 Narrow Range Temperature Sensor	RCS-133D	Yes/Yes	XXX
RCS Hot Leg 1 Wide Range Temperature Sensor	RCS-135A	Yes/Yes	XXX
RCS Hot Leg 2 Wide Range Temperature Sensor	RCS-135B	Yes/Yes	XXX
RCS Wide Range Pressure Sensor	RCS-140A	Yes/Yes	XXX
RCS Wide Range Pressure Sensor	RCS-140B	Yes/Yes	XXX
RCS Wide Range Pressure Sensor	RCS-140C	Yes/Yes	XXX
RCS Wide Range Pressure Sensor	RCS-140D	Yes/Yes	XXX
RCS Hot Leg 1 Level Sensor	RCS-160A	Yes/Yes	XXX
RCS Hot Leg 2 Level Sensor	RCS-160B	Yes/Yes	XXX
Passive Residual Heat Removal (PRHR) Return Line Temperature Sensor	RCS-161	Yes/Yes	XXX
Pressurizer Pressure Sensor	RCS-191A	Yes/Yes	XXX
Pressurizer Pressure Sensor	RCS-191B	Yes/Yes	XXX
Pressurizer Pressure Sensor	RCS-191C	Yes/Yes	XXX
Pressurizer Pressure Sensor	RCS-191D	Yes/Yes	XXX

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Enclosure 2  
Completion Plans

Table 2.1.2-1			
Equipment Name	Tag No.	Class 1E/Qual. for Harsh Envir.	EQ Reconciliation Report Number
Pressurizer Level Reference Leg Temperature Sensor	RCS-193A	Yes/Yes	XXX
Pressurizer Level Reference Leg Temperature Sensor	RCS-193B	Yes/Yes	XXX
Pressurizer Level Reference Leg Temperature Sensor	RCS-193C	Yes/Yes	XXX
Pressurizer Level Reference Leg Temperature Sensor	RCS-193D	Yes/Yes	XXX
Pressurizer Level Sensor	RCS-195A	Yes/Yes	XXX
Pressurizer Level Sensor	RCS-195B	Yes/Yes	XXX
Pressurizer Level Sensor	RCS-195C	Yes/Yes	XXX
Pressurizer Level Sensor	RCS-195D	Yes/Yes	XXX
RCP 1A Bearing Water Temperature Sensor	RCS-211A	Yes/Yes	XXX
RCP 1A Bearing Water Temperature Sensor	RCS-211B	Yes/Yes	XXX
RCP 1A Bearing Water Temperature Sensor	RCS-211C	Yes/Yes	XXX
RCP 1A Bearing Water Temperature Sensor	RCS-211D	Yes/Yes	XXX
RCP 1B Bearing Water Temperature Sensor	RCS-212A	Yes/Yes	XXX
RCP 1B Bearing Water Temperature Sensor	RCS-212B	Yes/Yes	XXX
RCP 1B Bearing Water Temperature Sensor	RCS-212C	Yes/Yes	XXX
RCP 1B Bearing Water Temperature Sensor	RCS-212D	Yes/Yes	XXX
RCP 2A Bearing Water Temperature Sensor	RCS-213A	Yes/Yes	XXX
RCP 2A Bearing Water Temperature Sensor	RCS-213B	Yes/Yes	XXX
RCP 2A Bearing Water Temperature Sensor	RCS-213C	Yes/Yes	XXX
RCP 2A Bearing Water Temperature Sensor	RCS-213D	Yes/Yes	XXX
RCP 2B Bearing Water Temperature Sensor	RCS-214A	Yes/Yes	XXX
RCP 2B Bearing Water Temperature Sensor	RCS-214B	Yes/Yes	XXX
RCP 2B Bearing Water Temperature Sensor	RCS-214C	Yes/Yes	XXX
RCP 2B Bearing Water Temperature Sensor	RCS-214D	Yes/Yes	XXX
RCP 1A Pump Speed Sensor	RCS-281	Yes/Yes	XXX
RCP 1B Pump Speed Sensor	RCS-282	Yes/Yes	XXX
RCP 2A Pump Speed Sensor	RCS-283	Yes/Yes	XXX
RCP 2B Pump Speed Sensor	RCS-284	Yes/Yes	XXX

**Subject: Uncompleted ITAAC 2.1.02.07c [Index No. 27]**

### **ITAAC Statement**

#### **Design Commitment**

7.c) *Separation is provided between RCS Class 1E divisions, and between Class 1E divisions and non-Class 1E cable.*

#### **Inspections/Tests/Analyses**

*See ITAAC Table 3.3-6, item 7.d).*

#### **Acceptance Criteria**

*See ITAAC Table 3.3-6, item 7.d).*

### **ITAAC Completion Description**

This ITAAC Design Commitment is shown to be met by reference to ITAAC 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c in VEGP Unit 3 Combined License (COL), Appendix C, Table 3.3-6. The referenced ITAAC demonstrate that physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.

The ITAAC Closure Notifications (References 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and 13) summarize the methodology for conducting the inspections, tests, or analyses and the results that demonstrate that the Reactor Coolant System (RCS) cables meet the applicable separation criteria. These closure notifications are submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination bases are referenced in the closure notifications for Items 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c of VEGP Unit 3 COL, Appendix C, Table 3.3-6 and notifications are available for NRC inspection as part of the ITAAC Completion Package (Reference 14).

### **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.i [Index No. 799]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.a [Index No. 800]
3. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.b [Index No. 801]
4. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.c [Index No. 802]
5. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.a [Index No. 803]
6. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.b [Index No. 804]
7. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.c [Index No. 805]
8. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.a [Index No. 806]
9. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.b [Index No. 807]
10. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.c [Index No. 808]
11. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.a [Index No. 809]
12. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.b [Index No. 810]
13. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.c [Index No. 811]
14. ITAAC 2.1.02.07c Completion Package
15. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 2.1.02.08d.v [36]**

**ITAAC Statement**

**Design Commitment**

*8.d) The RCS provides automatic depressurization during design basis events.*

**Inspection/Test Analysis**

*v) Inspections of the elevation of the ADS stage 4 valve discharge will be conducted.*

**Acceptance Criteria**

*v) The minimum elevation of the bottom inside surface of the outlet of these valves is greater than plant elevation 110 feet.*

**ITAAC Completion Description**

Multiple ITAAC are performed to demonstrate that the VEGP Unit 3 Reactor Coolant System (RCS) provides automatic depressurization during design basis events. The subject ITAAC requires that inspections of the Automatic Depressurization System (ADS) stage 4 valve discharge elevations be conducted to verify that the minimum elevation of the bottom inside surface of each stage 4 valve outlet is greater than plant elevation 110 feet.

The elevation of the bottom inside surface of each ADS valve outlet is measured using survey equipment in accordance with approved site survey procedures. The measurements are performed after installation of the ADS stage 4 valves. The results of the inspections verify the minimum elevation of the bottom inside surface of each stage 4 valve outlet is greater than plant elevation 110 feet. The actual elevations for the valves are listed below:

<b><u>Valve</u></b>	<b><u>Elevation</u></b>
SV3-RCS-PL-V004A	XXX feet
SV3-RCS-PL-V004B	XXX feet
SV3-RCS-PL-V004C	XXX feet
SV3-RCS-PL-V004D	XXX feet
SV3-RCS-PL-V014A	XXX feet
SV3-RCS-PL-V014B	XXX feet
SV3-RCS-PL-V014C	XXX feet
SV3-RCS-PL-V014D	XXX feet



The inspection results are documented in “ADS Stage 4 Valves Outlet Bottom Inside Surface Elevation Inspection Report” (Reference 1). This report is available for NRC inspection as part of the ITAAC Completion Package (Reference 2). The inspections verify the minimum elevation of the bottom inside surface of each ADS stage 4 valve outlet is greater than plant elevation 110 feet.

### **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

### **References (available for NRC inspection)**

1. ADS Stage 4 Valves Outlet Bottom Inside Surface Elevation Inspection Report
2. ITAAC 2.1.02.08d.v Completion Package
3. NEI 08-01, “Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52”

**Subject: Uncompleted ITAAC 2.1.02.08d.vi [Index No. 37]**

**ITAAC Statement**

**Design Commitment**

8.d) *The RCS provides automatic depressurization during design basis events.*

**Inspection/Test Analysis**

vi) *Inspections of the ADS stage 4 valve discharge will be conducted.*

**Acceptance Criteria**

vi) *The discharge of the ADS stage 4 valves is directed into the steam generator compartments.*

**ITAAC Completion Description**

Multiple ITAAC are performed to demonstrate that the VEGP Unit 3 Reactor Coolant System (RCS) provides automatic depressurization during design basis events. The subject ITAAC requires that inspections of the Automatic Depressurization System (ADS) stage 4 valves be conducted to verify that the discharge of the valves is directed into the steam generator compartments.

Visual inspections of each ADS stage 4 valve discharge are performed after installation of the valves. The results of the inspections are documented in "ADS Stage 4 Valves Discharge into the Steam Generator Compartments Inspection Report" (Reference 1) and verify the discharges are directed into the steam generator compartments.

The inspection results are available for NRC inspection as part of the ITAAC Completion Package (Reference 2). The inspections verify the discharge of the ADS stage 4 valves is directed into the steam generator compartments.

**List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. ADS Stage 4 Valves Discharge Into the Steam Generator Compartments Inspection Report
2. ITAAC 2.1.02.08d.vi Completion Package
3. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 2.1.03.02a [Index No. 69]**

**ITAAC Statement**

**Design Commitment**

*2.a) The reactor upper internals rod guide arrangement is as shown in Figure 2.1.3-1.*

**Inspections/Tests/Analyses**

*Inspection of the as-built system will be performed.*

**Acceptance Criteria**

*The as-built RXS will accommodate the fuel assembly and control rod drive mechanism pattern shown in Figure 2.1.3-1.*

**ITAAC Completion Description**

An inspection of the as-built Reactor System (RXS) is performed to verify the reactor upper internals rod guide arrangement is as shown in VEGP Unit 3 Combined License (COL) Figure 2.1.3-1.

The RXS equipment is installed in accordance with approved drawings and specifications. An inspection (walkdown) of the as-built RXS is performed to verify that the reactor upper internals rod guide arrangement accommodates the fuel assembly and control rod drive mechanism pattern shown in Figure 2.1.3-1. The walkdown is completed using Reactor System Walkdown Procedure XXX-XXX-XX (Reference 1) which requires the preparation of a detailed inspection plan. This plan includes the use of detailed drawings to perform visual observations and compare the as-built system to the reactor upper internals rod guide arrangement.

The inspection results are documented in the Reactor System Walkdown Inspection Report YYY-YYY-YY (Reference 2) and confirm that the as-built RXS will accommodate the fuel assembly and control rod drive mechanism pattern shown in Figure 2.1.3-1. This report is available for NRC inspection as part of the ITAAC Completion Package (Reference 3).

**List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. Reactor System Walkdown Inspection Procedure, XXX-XXX-XX
2. Reactor System Walkdown Inspection Report, YYY-YYY-YY

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3. ITAAC 2.1.03.02a Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

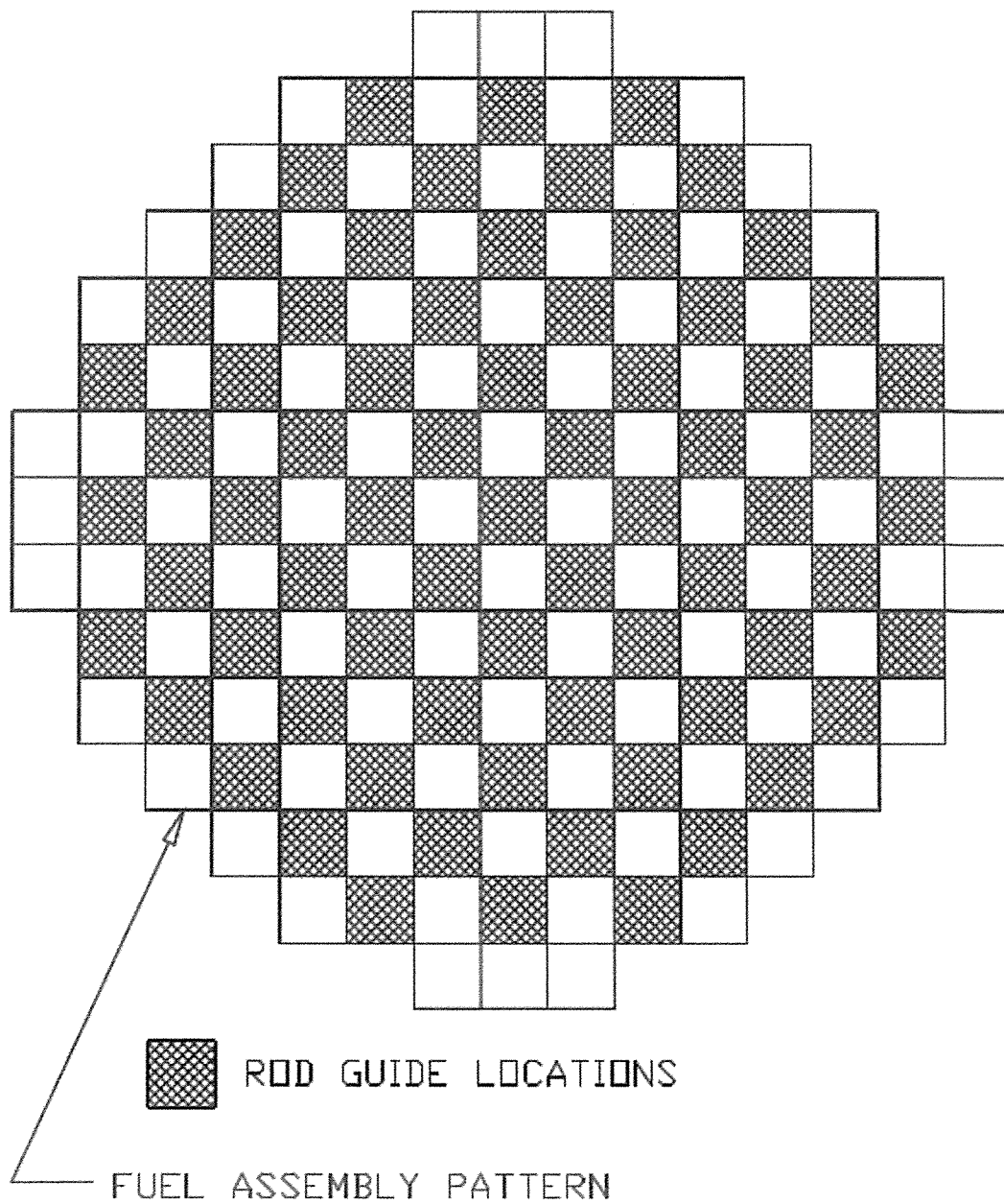


Figure 2.1.3-1  
Reactor Upper Internals Rod Guide Arrangement

**Subject: Uncompleted ITAAC 2.1.03.03 [Index No. 72]**

**ITAAC Statement**

**Design Commitment**

3. *The components identified in Table 2.1.3-1 as ASME Code Section III are designed and constructed in accordance with ASME Code Section III requirements.*

**Inspections/Tests/Analyses**

*Inspection will be conducted of the as-built components as documented in the ASME design reports.*

**Acceptance Criteria**

*The ASME Code Section III design reports exist for the as-built components identified in Table 2.1.3-1 as ASME Code Section III.*

**ITAAC Completion Description**

An inspection is performed in accordance with the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (BPVC) Section III (Reference 1) to demonstrate that the as-built components identified in VEGP Unit 3 Combined License (COL) Appendix C Table 2.1.3-1 (Attachment A) as ASME Code Section III are designed and constructed in accordance with ASME Code Section III requirements.

Each component listed in Attachment A as ASME Code Section III is fabricated in accordance with the design and ASME Code Section III requirements. The ASME Code Section III Design Reports for these components exist and document that the as-built components conform to the approved design details. The ASME Section III Design Report for each component is documented in the component's completed ASME Section III Code Data Report. The individual ASME Section III Code Data Reports are documented on the ASME Section III N-5 Code Data Report for the Reactor System (Reference 2).

The as-built system, including the components listed in VEGP Unit 3 COL Appendix C Table 2.1.3-1 as ASME Code Section III, is subjected to a reconciliation process (Reference 3), which verifies that the as-built system has been analyzed for applicable loads (e.g. stress reports) and for compliance with all design specification and Code provisions. Design reconciliation of the as-built system validates that construction completion, including field changes and any nonconforming condition dispositions, is consistent with and bounded by the approved design. All applicable fabrication, installation and testing records, as well as those for the related QA verification and inspection activities, which confirm adequate construction in compliance with the ASME Code Section III and the design provisions, are referenced in the N-5 data report and/or its sub-tier references.

The ASME Section III N-5 Code Data Report, which includes the Design Reports for all the components listed in VEGP Unit 3 COL Appendix C Table 2.1.3-1 as ASME Code Section III, exists and concludes that these components have been designed and constructed in accordance with the ASME Code Section III requirements. The N-5 Code Data Report is

identified in Attachment A and is available for NRC inspection as part of the ITAAC Completion Package (Reference 4).

### **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

### **References (available for NRC inspection)**

1. American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (BPVC) Section III requirements as described in VEGP 3&4 Updated Final Safety Analysis Report, Section 5.2.1, Compliance with Codes and Code Cases
2. ASME Section III N-5 Code Data Report XXX for the Reactor System
3. APP-GW-GER-031, Revision 0, "AP1000 As-built Reconciliation Program for ASME Section III Components"
4. ITAAC 2.1.03.03 Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A: Excerpt from COL Appendix C Table 2.1.3-1

Equipment Name	Tag No.	ASME Code Section III Classification	N-5 Code Data Report
RV	RXS-MV-01	Yes	XXX
Reactor Upper Internals Assembly	RXS-MI-01	Yes	XXX
Reactor Lower Internals Assembly	RXS-MI-02	Yes	XXX
Control Rod Drive Mechanisms (CRDMs) (69 Locations)	RXS-MV-1B06/11B08/11B10/11C05/11C07/ 11C09/11C11/11D04/11D06/11D08/11D10/ 11D12/11E03/11E05/11E07/11E09/11E11/ 11E13/11F02/11F04/11F06/11F08/11F10/ 11F12/11F14/11G03/11G05/11G07/11G09/ 11G11/11G13/11H02/11H04/11H06/11H08/ 11H10/11H12/11H14/11J03/11J05/11J07/ 11J09/11J11/11J13/11K02/11K04/11K06/ 11K08/11K10/11K12/11K14/11L03/11L05/ 11L07/11L09/11L11/11L13/11M04/11M06/ 11M08/11M10/11M12/11N05/11N07/11N09/ 11N11/11P06/11P08/11P10	Yes	XXX
Incore Instrument QuickLoc Assemblies (8 Locations)	RXS-MY-Y11 through Y18	Yes	XXX



**Subject: Uncompleted ITAAC 2.1.03.06.i [Index No. 75]**

**ITAAC Statement**

**Design Commitment**

6. *The seismic Category I equipment identified in Table 2.1.3-1 can withstand seismic design basis loads without loss of safety function.*

**Inspections/Tests/Analyses**

- i) *Inspection will be performed to verify that the seismic Category I equipment identified in Table 2.1.3-1 is located on the Nuclear Island.*

**Acceptance Criteria**

- i) *The seismic Category I equipment identified in Table 2.1.3-1 is located on the Nuclear Island.*

**ITAAC Completion Description**

Multiple ITAAC are performed to demonstrate that the seismic Category I equipment identified in VEGP Unit 3 Combined License (COL) Appendix C Table 2.1.3-1 (Attachment A) can withstand seismic design basis loads without loss of safety function. The subject ITAAC requires an inspection be performed to verify that the seismic Category I equipment identified in Table 2.1.3-1 are located on the Nuclear Island, which is a Seismic Category I structure.

To assure that seismic Category I equipment can withstand seismic design basis loads without loss of safety function, all of the equipment in VEGP Unit 3 COL Appendix C Table 2.1.3-1 are designed to be located on the seismic Category I Nuclear Island. In accordance with Equipment Qualification (EQ) Walkdown Inspection Procedure XYZ (Reference 1), an inspection is conducted on the Reactor System (RXS) to confirm the satisfactory installation of the seismically qualified equipment. The inspection includes verification of equipment make/model/serial number and verification of equipment location (Building, Elevation, Room). The inspection to verify installed equipment locations is documented in the EQ As-Built Reconciliation Report(s) (Reference 2).

Attachment A identifies the EQ As-built Reconciliation Report(s) which verify that the installed location of the Seismic Category I equipment identified in VEGP Unit 3 COL Appendix C Table 2.1.3-1 is located on the Nuclear Island. The EQ As-Built Reconciliation Report(s) are available for NRC inspection as part of the ITAAC Completion Package (Reference 3).

**List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

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**References (available for NRC inspection)**

1. EQ Walkdown Inspection Procedure XYZ
2. EQ As-Built Reconciliation Report(s) as identified in Attachment A
3. ITAAC 2.1.03.06.i Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A: Excerpt from COL Appendix C Table 2.1.3-1

ITAAC COMPLIANCE MATRIX FOR SEISMIC CATEGORY I EQUIPMENT  
(REACTOR SYSTEM)

Equipment Name	Tag No.	Seismic Cat. I	EQ As-Built Reconciliation Report(s)
RV	RXS-MV-01	Yes	XXX
Reactor Upper Internals Assembly	RXS-MI-01	Yes	XXX
Reactor Lower Internals Assembly	RXS-MI-02	Yes	XXX
Fuel Assemblies (157 locations)	RXS-FA-A07/A08/A09/B05/B06/B07/B08/ B09/B10/B11/C04/C05/C06/C07/C08/C09/C10/ C11/C12/D03/D04/D05/D06/D07/D08/D09/ D10/D11/D12/D13/E02/E03/E04/E05/E06/E07/ E08/E09/E10/E11/E12/E13/E14/F02/F03/F04/ F05/F06/F07/F08/F09/F10/F11/F12/F13/F14/ G01/G02/G03/G04/G05/G06/G07/G08/G09/ G10/G11/G12/G13/G14/G15/H01/H02/H03/ H04/H05/H06/H07/H08/H09/H10/H11/H12/ H13/H14/H15/J01/J02/J03/J04/J05/J06/J07/J08 / J09/J10/J11/J12/J13/J14/J15/K02/K03/K04/ K05/K06/K07/K08/K09/K10/K11/K12/K13/ K14/L02/L03/L04/L05/L06/L07/L08/L09/L10/ L11/L12/L13/L14/M03/M04/M05/M06/M07/ M08/M09/M10/M11/M12/M13/N04/N05/N06/ N07/N08/N09/N10/N11/N12/P05/P06/P07/P08/ P09/P10/P11/R07/R08/R09	Yes	XXX
Rod Cluster Control Assemblies (RCCAs) (minimum 53 locations)	RXS-FR-B06/B10/C05/C07/C09/C11/D06/ D08/D10/E03/E05/E07/E09/E11/E13/F02/F04/ F12/F14/G03/G05/G07/G09/G11/G13/H04/ H08/H12/J03/J05/J07/J09/J11/J13/K02/K04/ K12/K14/L03/L05/L07/L09/L11/L13/M06/ M08/M10/N05/N07/N09/N11/P06/P10	Yes	XXX
Gray Rod Cluster Assemblies (GRCAs) (16 locations)	RXS-FG-B08/D04/D12/F06/F08/F10/H02/H06/ H10/H14/K06/K08/K10/M04/M12/P08	Yes	XXX
Control Rod Drive Mechanisms (CRDMs) (69 Locations)	RXS-MV-11B06/11B08/11B10/11C05/11C07/ 11C09/11C11/11D04/11D06/11D08/11D10/ 11D12/11E03/11E05/11E07/11E09/11E11/ 11E13/11F02/11F04/11F06/11F08/11F10/ 11F12/11F14/11G03/11G05/11G07/11G09/ 11G11/11G13/11H02/11H04/11H06/11H08/ 11H10/11H12/11H14/11J03/11J05/11J07/ 11J09/11J11/11J13/11K02/11K04/11K06/ 11K08/11K10/11K12/11K14/11L03/11L05/ 11L07/11L09/11L11/11L13/11M04/11M06/ 11M08/11M10/11M12/11N05/11N07/11N09/ 11N11/11P06/11P08/11P10	Yes	XXX
Incore Instrument QuickLoc Assemblies (8 Locations)	RXS-MY-Y11 through Y18	Yes	XXX
Source Range Detectors (4)	RXS-JE-NE001A/NE001B/NE001C/NE001D	Yes	XXX
Intermediate Range Detectors (4)	RXS-JE-NE002A/NE002B/NE002C/NE002D	Yes	XXX

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Equipment Name	Tag No.	Seismic Cat. I	EQ As-Built Reconciliation Report(s)
Power Range Detectors – Lower (4)	RXS-JE-NE003A/NE003B/NE003C/NE003D	Yes	XXX
Power Range Detectors – Upper (4)	RXS-JE-NE004A/NE004B/NE004C/NE004D	Yes	XXX

**Subject: Uncompleted ITAAC 2.1.03.09c [Index No. 84]**

**ITAAC Statement**

**Design Commitment**

*9.c) Separation is provided between RXS Class 1E divisions, and between Class 1E divisions and non-Class 1E cable.*

**Inspections/Tests/Analyses**

*See ITAAC Table 3.3-6, item 7.d.*

**Acceptance Criteria**

*See ITAAC Table 3.3-6, item 7.d.*

**ITAAC Completion Description**

This ITAAC Design Commitment is shown to be met by reference to ITAAC 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c in VEGP Unit 3 Combined License (COL) Appendix C Table 3.3-6. The referenced ITAAC demonstrate that physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.

The ITAAC Closure Notifications (References 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and 13) summarize the methodology for conducting the Inspections/Tests/Analyses, and the results that demonstrate that the Reactor System (RXS) cables meet the applicable separation criteria. These closure notifications are submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination bases are referenced in the closure notifications for Items 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c of VEGP Unit 3 COL Appendix C Table 3.3-6 and notifications are available for NRC inspection as part of the ITAAC Completion Package (Reference 14).

**List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.i [Index No. 799]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.a [Index No. 800]
3. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.b [Index No. 801]
4. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.c [Index No. 802]
5. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.a [Index No. 803]
6. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.b [Index No. 804]
7. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.c [Index No. 805]
8. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.a [Index No. 806]
9. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.b [Index No. 807]
10. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.c [Index No. 808]
11. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.a [Index No. 809]
12. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.b [Index No. 810]
13. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.c [Index No. 811]
14. ITAAC 2.1.03.09c Completion Package
15. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 2.2.01.06c [Index No. 104]**

**ITAAC Statement**

**Design Commitment**

6.c) *Separation is provided between CNS Class 1E divisions, and between Class 1E divisions and non-Class 1E cable.*

**Inspections/Tests/Analyses**

*See ITAAC Table 3.3-6, item 7.d.*

**Acceptance Criteria**

*See ITAAC Table 3.3-6, item 7.d.*

**ITAAC Completion Description**

This ITAAC Design Commitment is shown to be met by reference to ITAAC 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c in VEGP Unit 3 Combined License (COL) Appendix C Table 3.3-6. The referenced ITAAC demonstrate that physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.

The ITAAC Closure Notifications (References 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and 13) summarize the methodology for conducting the Inspections/Tests/Analyses, and the results that demonstrate that the Containment System (CNS) cables meet the applicable separation criteria. These closure notifications are submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination bases are referenced in the closure notifications for Items 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c of VEGP Unit 3 COL Appendix C Table 3.3-6 and notifications are available for NRC inspection as part of the ITAAC Completion Package (Reference 14).

**List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.i [Index No. 799]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.a [Index No. 800]
3. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.b [Index No. 801]
4. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.c [Index No. 802]
5. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.a [Index No. 803]
6. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.b [Index No. 804]
7. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.c [Index No. 805]
8. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.a [Index No. 806]
9. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.b [Index No. 807]
10. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.c [Index No. 808]
11. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.a [Index No. 809]
12. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.b [Index No. 810]
13. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.c [Index No. 811]
14. ITAAC 2.2.01.06c Completion Package
15. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"



**Subject: Uncompleted ITAAC 2.2.02.02a [Index No. 120]**

**ITAAC Statement**

**Design Commitment**

2.a) *The components identified in Table 2.2.2-1 as ASME Code Section III are designed and constructed in accordance with ASME Code Section III requirements.*

**Inspections/Tests/Analyses**

*Inspection will be conducted of the as-built components as documented in the ASME design reports.*

**Acceptance Criteria**

*The ASME Code Section III design reports exist for the as-built components identified in Table 2.2.2-1 as ASME Code Section III.*

**ITAAC Completion Description**

An inspection is performed in accordance with the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (BPVC) Section III (Reference 1) to demonstrate that the as-built components identified in VEGP Unit 3 Combined License (COL) Appendix C Table 2.2.2-1 (Attachment A) as ASME Code Section III are designed and constructed in accordance with ASME Code Section III requirements.

Each component listed in Attachment A as ASME Code Section III is fabricated in accordance with the design and ASME Code Section III requirements. The ASME Code Section III Design Reports for these components exist and document that the as-built components conform to the approved design details. The ASME Section III Design Report for each component is documented in the component's completed ASME Section III Code Data Report. The individual ASME Section III Code Data Reports are documented on the ASME Section III N-5 Code Data Report for the Passive Containment Cooling System (Reference 2).

The as-built system, including the components listed in VEGP Unit 3 COL Appendix C Table 2.2.2-1 as ASME Code Section III, is subjected to a reconciliation process (Reference 3), which verifies that the as-built system has been analyzed for applicable loads (e.g. stress reports) and for compliance with all design specification and Code provisions. Design reconciliation of the as-built system validates that construction completion, including field changes and any nonconforming condition dispositions, is consistent with and bounded by the approved design. All applicable fabrication, installation and testing records, as well as those for the related QA verification and inspection activities, which confirm adequate construction in compliance with the ASME Code Section III and the design provisions, are referenced in the N-5 data report and/or its sub-tier references.

The ASME Section III N-5 Code Data Report, which includes the Design Reports for all the components listed in VEGP Unit 3 COL Appendix C Table 2.2.2-1 as ASME Code Section III, exists and concludes that these components have been designed and constructed in accordance with the ASME Code Section III requirements. The N-5 Code Data Report is

identified in Attachment A and is available for NRC inspection as part of the ITAAC Completion Package (Reference 4).

### **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

### **References (available for NRC inspection)**

1. American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (BPVC) Section III requirements as described in VEGP 3&4 Updated Final Safety Analysis Report, Section 5.2.1, Compliance with Codes and Code Cases
2. ASME Section III N-5 Code Data Report XXX for the Passive Containment Cooling System
3. APP-GW-GER-031, Revision 0, "AP1000 As-built Reconciliation Program for ASME Section III Components"
4. ITAAC 2.2.02.02a Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A: Excerpt from COL Appendix C Table 2.2.2-1

<b>Equipment Name</b>	<b>Tag No.</b>	<b>ASME Code Section III Classification</b>	<b>N-5 Code Data Report</b>
PCCWST Isolation Valve	PCS-PL-V001A	Yes	XXX
PCCWST Isolation Valve	PCS-PL-V001B	Yes	XXX
PCCWST Isolation Valve	PCS-PL-V001C	Yes	XXX
PCCWST Isolation Block MOV	PCS-PL-V002A	Yes	XXX
PCCWST Isolation Block MOV	PCS-PL-V002B	Yes	XXX
PCCWST Isolation Block MOV	PCS-PL-V002C	Yes	XXX
PCS Recirculation Return Isolation Valve	PCS-PL-V023	Yes	XXX
PCCWST Supply to Fire Protection System Isolation Valve	PCS-PL-V005	Yes	XXX
PCS Makeup to SFS Isolation Valve	PCS-PL-V009	Yes	XXX
Water Makeup Isolation Valve	PCS-PL-V044	Yes	XXX
Water Bucket Makeup Line Drain Valve	PCS-PL-V015	Yes	XXX
Water Bucket Makeup Line Isolation Valve	PCS-PL-V020	Yes	XXX
PCCWST Long-Term Makeup Line Check Valve	PCS-PL-V039	Yes	XXX
PCCWST Long-Term Makeup Drain Isolation	PCS-PL-V042	Yes	XXX
PCS Discharge to SFS Pool Isolation Valve	PCS-PL-V045	Yes	XXX
Recirc Header Discharge to PCCWST Isolation Valve	PCS-PL-V046	Yes	XXX
PCCWST Drain Isolation Valve	PCS-PL-V049	Yes	XXX
Recirc Header Discharge to SFS Pool Isolation Valve	PCS-PL-V050	Yes	XXX
PCCWST Discharge to SFS Pool Isolation Valve	PCS-PL-V051	Yes	XXX

**Subject: Uncompleted ITAAC 2.2.02.06c [Index No. 134]**

## **ITAAC Statement**

### **Design Commitment**

6.c) *Separation is provided between PCS Class 1E divisions, and between Class 1E divisions and non-Class 1E cable.*

### **Inspections/Tests/Analyses**

*See ITAAC Table 3.3-6, item 7.d.*

### **Acceptance Criteria**

*See ITAAC Table 3.3-6, item 7.d.*

## **ITAAC Completion Description**

This ITAAC Design Commitment is shown to be met by reference to ITAAC 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c in VEGP Unit 3 Combined License (COL) Appendix C Table 3.3-6. The referenced ITAAC demonstrate that physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.

The ITAAC Closure Notifications (References 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and 13) summarize the methodology for conducting the Inspections/Tests/Analyses, and the results that demonstrate that the Passive Containment Cooling System (PCS) cables meet the applicable separation criteria. These closure notifications are submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination bases are referenced in the closure notifications for Items 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c of VEGP Unit 3 COL Appendix C Table 3.3-6 and notifications are available for NRC inspection as part of the ITAAC Completion Package (Reference 14).

## **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.i [Index No. 799]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.a [Index No. 800]
3. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.b [Index No. 801]
4. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.c [Index No. 802]
5. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.a [Index No. 803]
6. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.b [Index No. 804]
7. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.c [Index No. 805]
8. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.a [Index No. 806]
9. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.b [Index No. 807]
10. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.c [Index No. 808]
11. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.a [Index No. 809]
12. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.b [Index No. 810]
13. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.c [Index No. 811]
14. ITAAC 2.2.02.06c Completion Package
15. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 2.2.03.07c [Index No. 173]**

### **ITAAC Statement**

#### **Design Commitment**

7.c) *Separation is provided between PXS Class 1E divisions, and between Class 1E divisions and non-Class 1E cable.*

#### **Inspections/Tests/Analyses**

*See ITAAC Table 3.3-6, item 7.d.*

#### **Acceptance Criteria**

*See ITAAC Table 3.3-6, item 7.d.*

### **ITAAC Completion Description**

This ITAAC Design Commitment is shown to be met by reference to ITAAC 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c in VEGP Unit 3 Combined License (COL) Appendix C Table 3.3-6. The referenced ITAAC demonstrate that physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.

The ITAAC Closure Notifications (References 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and 13) summarize the methodology for conducting the Inspections/Tests/Analyses, and the results that demonstrate that the Passive Core Cooling System (PXS) cables meet the applicable separation criteria. These closure notifications are submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination bases are referenced in the closure notifications for Items 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c of VEGP Unit 3 COL Appendix C Table 3.3-6 and notifications are available for NRC inspection as part of the ITAAC Completion Package (Reference 14).

### **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.i [Index No. 799]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.a [Index No. 800]
3. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.b [Index No. 801]
4. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.c [Index No. 802]
5. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.a [Index No. 803]
6. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.b [Index No. 804]
7. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.c [Index No. 805]
8. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.a [Index No. 806]
9. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.b [Index No. 807]
10. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.c [Index No. 808]
11. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.a [Index No. 809]
12. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.b [Index No. 810]
13. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.c [Index No. 811]
14. ITAAC 2.2.03.07c Completion Package
15. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 2.2.03.09b [Index No. 204]**

**ITAAC Statement**

**Design Commitment**

9.b) *The accumulator discharge check valves (PXS-PL-V028A/B and V029A/B) are of a different check valve type than the CMT discharge check valves (PXS-PL-V016A/B and V017A/B).*

**Inspections/Tests/Analyses**

*An inspection of the accumulator and CMT discharge check valves is performed.*

**Acceptance Criteria**

*The accumulator discharge check valves are of a different check valve type than the CMT discharge check valves.*

**ITAAC Completion Description**

Visual inspections of the VEGP Unit 3 Passive Core Cooling System (PXS) accumulator discharge check valves (PXS-PL-V028A/B) and (PXS-PL-V029A/B) and the Core Makeup Tank (CMT) discharge check valves (PXS-PL-V016A/B) and (PXS-PL-V017A/B) are performed to demonstrate that the accumulator discharge check valves are of a different check valve type than the CMT discharge check valves.

The accumulator discharge check valves are visually inspected and verified to be “swing” check valves. The CMT discharge check valves are visually inspected and verified to be “in-line” check valves. “Swing” check valves and “in-line” check valves are different check valve types, thereby confirming that the accumulator discharge check valves are of a different check valve type than the CMT discharge check valves.

The results of the inspections are documented in XXX-YYYY-ZZZ-AAA, “Inspection Report Confirming Discharge Check Valve Type for the Passive Core Cooling System Accumulator Discharge Check Valves and Core Makeup Tank Discharge Check Valves” (Reference 1). This report is available for NRC inspection as part of the ITAAC Completion Package (Reference 2). The results of the comparison verify that the Passive Core Cooling System (PXS) accumulator discharge check valves are of a different check valve type than the CMT discharge check valves.

**List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.



**References (available for NRC inspection)**

1. Inspection Report Confirming Discharge Check Valve Type for the Passive Core Cooling System Accumulator Discharge Check Valves and Core Makeup Tank Discharge Check Valves, XXX-YYYY-ZZZ-AAA
2. ITAAC 2.2.03.09b Completion Package
3. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 2.2.04.02a [Index No. 220]**

**ITAAC Statement**

**Design Commitment**

- 2.a) *The components identified in Table 2.2.4-1 as ASME Code Section III are designed and constructed in accordance with ASME Code Section III requirements.*

**Inspections/Tests/Analyses**

*Inspection will be conducted of the as-built components as documented in the ASME design reports.*

**Acceptance Criteria**

*The ASME Code Section III design reports exist for the as-built components identified in Table 2.2.4-1 as ASME Code Section III.*

**ITAAC Completion Description**

An inspection is performed in accordance with the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (BPVC) Section III (Reference 1) to demonstrate that the as-built components identified in VEGP Unit 3 Combined License (COL) Appendix C Table 2.2.4-1 (Attachment A) as ASME Code Section III are designed and constructed in accordance with ASME Code Section III requirements.

Each component listed in Attachment A as ASME Code Section III is fabricated in accordance with the design and ASME Code Section III requirements. The ASME Code Section III Design Reports for these components exist and document that the as-built components conform to the approved design details. The ASME Section III Design Report for each component is documented in the component's completed ASME Section III Code Data Report. The individual ASME Section III Code Data Reports are documented on the ASME Section III N-5 Code Data Report for the Steam Generator System (Reference 2).

The as-built system, including the components listed in VEGP Unit 3 COL Appendix C Table 2.2.4-1 as ASME Code Section III, is subjected to a reconciliation process (Reference 3), which verifies that the as-built system has been analyzed for applicable loads (e.g. stress reports) and for compliance with all design specification and Code provisions. Design reconciliation of the as-built system validates that construction completion, including field changes and any nonconforming condition dispositions, is consistent with and bounded by the approved design. All applicable fabrication, installation and testing records, as well as those for the related QA verification and inspection activities, which confirm adequate construction in compliance with the ASME Code Section III and the design provisions, are referenced in the N-5 data report and/or its sub-tier references.

The ASME Section III N-5 Code Data Report, which includes the Design Reports for all the components listed in VEGP Unit 3 COL Appendix C Table 2.2.4-1 as ASME Code Section III, exists and concludes that these components have been designed and constructed in accordance with the ASME Code Section III requirements. The N-5 Code Data Report is

identified in Attachment A and is available for NRC inspection as part of the ITAAC Completion Package (Reference 4).

### **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

### **References (available for NRC inspection)10**

1. American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (BPVC) Section III requirements as described in VEGP 3&4 Updated Final Safety Analysis Report, Section 5.2.1, Compliance with Codes and Code Cases
2. ASME Section III N-5 Code Data Report XXX for the Steam Generator System
3. APP-GW-GER-031, Revision 0, "AP1000 As-built Reconciliation Program for ASME Section III Components"
4. ITAAC 2.2.04.02a Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A: Excerpt from Table 2.2.4-1 of COL Appendix C

Equipment Name	Tag No.	ASME Code Section III Classification	N-5 Code Data Report
Main Steam Safety Valve SG01	SGS-PL-V030A	Yes	XXX
Main Steam Safety Valve SG02	SGS-PL-V030B	Yes	XXX
Main Steam Safety Valve SG01	SGS-PL-V031A	Yes	XXX
Main Steam Safety Valve SG02	SGS-PL-V031B	Yes	XXX
Main Steam Safety Valve SG01	SGS-PL-V032A	Yes	XXX
Main Steam Safety Valve SG02	SGS-PL-V032B	Yes	XXX
Main Steam Safety Valve SG01	SGS-PL-V033A	Yes	XXX
Main Steam Safety Valve SG02	SGS-PL-V033B	Yes	XXX
Main Steam Safety Valve SG01	SGS-PL-V034A	Yes	XXX
Main Steam Safety Valve SG02	SGS-PL-V034B	Yes	XXX
Main Steam Safety Valve SG01	SGS-PL-V035A	Yes	XXX
Main Steam Safety Valve SG02	SGS-PL-V035B	Yes	XXX
Power-operated Relief Valve Block Motor-operated Valve Steam Generator 01	SGS-PL-V027A	Yes	XXX
Power-operated Relief Valve Block Motor-operated Valve Steam Generator 02	SGS-PL-V027B	Yes	XXX
Steam Line Condensate Drain Isolation Valve	SGS-PL-V036A	Yes	XXX
Steam Line Condensate Drain Isolation Valve	SGS-PL-V036B	Yes	XXX
Main Steam Line Isolation Valve	SGS-PL-V040A	Yes	XXX
Main Steam Line Isolation Valve	SGS-PL-V040B	Yes	XXX
Steam Line Condensate Drain Control Valve	SGS-PL-V086A	Yes	XXX
Steam Line Condensate Drain Control Valve	SGS-PL-V086B	Yes	XXX
Main Feedwater Isolation Valve	SGS-PL-V057A	Yes	XXX
Main Feedwater Isolation Valve	SGS-PL-V057B	Yes	XXX
Startup Feedwater Isolation Motor- operated Valve	SGS-PL-V067A	Yes	XXX
Startup Feedwater Isolation Motor- operated Valve	SGS-PL-V067B	Yes	XXX
Steam Generator Blowdown Isolation Valve	SGS-PL-V074A	Yes	XXX
Steam Generator Blowdown Isolation Valve	SGS-PL-V074B	Yes	XXX
Steam Generator Blowdown Isolation Valve	SGS-PL-V075A	Yes	XXX
Steam Generator Blowdown Isolation Valve	SGS-PL-V075B	Yes	XXX
Power-operated Relief Valve	SGS-PL-V233A	Yes	XXX
Power-operated Relief Valve	SGS-PL-V233B	Yes	XXX
Main Steam Isolation Valve Bypass Isolation	SGS-PL-V240A	Yes	XXX
Main Steam Isolation Valve Bypass Isolation	SGS-PL-V240B	Yes	XXX
Main Feedwater Control Valve	SGS-PL-V250A	Yes	XXX
Main Feedwater Control Valve	SGS-PL-V250B	Yes	XXX
Startup Feedwater Control Valve	SGS-PL-V255A	Yes	XXX
Startup Feedwater Control Valve	SGS-PL-V255B	Yes	XXX

**Subject: Uncompleted ITAAC 2.2.04.07c [Index No. 234]**

### **ITAAC Statement**

#### **Design Commitment**

7.c) *Separation is provided between SGS Class 1E divisions, and between Class 1E divisions and non-Class 1E cable.*

#### **Inspections/Tests/Analyses**

*See ITAAC Table 3.3-6, item 7.d.*

#### **Acceptance Criteria**

*See ITAAC Table 3.3-6, item 7.d.*

### **ITAAC Completion Description**

This ITAAC Design Commitment is shown to be met by reference to ITAAC 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c in VEGP Unit 3 Combined License (COL) Appendix C Table 3.3-6. The referenced ITAAC demonstrate that physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.

The ITAAC Closure Notifications (References 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and 13) summarize the methodology for conducting the Inspections/Tests/Analyses, and the results that demonstrate that the Steam Generator System (SGS) cables meet the applicable separation criteria. These closure notifications are submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination bases are referenced in the closure notifications for Items 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c of VEGP Unit 3 COL Appendix C Table 3.3-6 and notifications are available for NRC inspection as part of the ITAAC Completion Package (Reference 14).

### **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.i [Index No. 799]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.a [Index No. 800]
3. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.b [Index No. 801]
4. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.c [Index No. 802]
5. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.a [Index No. 803]
6. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.b [Index No. 804]
7. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.c [Index No. 805]
8. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.a [Index No. 806]
9. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.b [Index No. 807]
10. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.c [Index No. 808]
11. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.a [Index No. 809]
12. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.b [Index No. 810]
13. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.c [Index No. 811]
14. ITAAC 2.2.04.07c Completion Package
15. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 2.2.04.08b.i [Index No. 237]**

**ITAAC Statement**

**Design Commitment**

- 8.b) *During design basis events, the SGS limits steam generator blowdown and feedwater flow to the steam generator.*

**Inspections/Tests/Analyses**

- i) *Testing will be performed to confirm isolation of the main feedwater, startup feedwater, blowdown, and main steam lines. See item 11 in this table.*

**Acceptance Criteria**

*See item 11 in this table.*

**ITAAC Completion Description**

This ITAAC Design Commitment is met by reference to item 11a, 11b.i, and 11b.ii in VEGP Unit 3 Combined License (COL), Appendix C, ITAAC Table 2.2.4-4.

Item 11a performs stroke testing on the remotely operated valves listed in VEGP Unit 3 COL, Appendix C, Table 2.2.4-1 using controls in the Main Control Room. Item 11b.i performs testing on the remotely operated valves listed in VEGP Unit 3 COL, Appendix C, Table 2.2.4-1 using real or simulated signals into the Protection and Safety Monitoring System (PMS). Item 11b.ii performs testing to demonstrate that remotely operated Steam Generator System isolation valves SGS-V027A/B, V040A/B, V057A/B, and V250A/B close within the required response times.

The closure notifications (References 1, 2, and 3) summarize the methodology for item 11 from VEGP Unit 3 COL, Appendix C, ITAAC table 2.2.4-4 for conducting the inspections, tests, or analyses (ITA) and the results that demonstrate that the acceptance criteria are met. These closure notifications are submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination bases are referenced in the closure notifications for items 11a, 11b.i, and 11b.ii of VEGP Unit 3 COL, Appendix C, Table 2.2.4-4, and are available for NRC inspection as part of the ITAAC Completion Package (Reference 4).

**List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.04.11a [Index No. 245]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.04.11b.i [Index No. 246]
3. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.04.11b.ii [Index No. 247]
4. ITAAC 2.2.04.08b.i Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"



**Subject: Uncompleted ITAAC 2.2.05.06b [Index No. 264]**

## **ITAAC Statement**

### **Design Commitment**

6.b) *Separation is provided between VES Class 1E divisions, and between Class 1E divisions and non-Class 1E cable.*

### **Inspections/Tests/Analyses**

*See ITAAC Table 3.3-6, item 7.d.*

### **Acceptance Criteria**

*See ITAAC Table 3.3-6, item 7.d.*

## **ITAAC Completion Description**

This ITAAC Design Commitment is shown to be met by reference to ITAAC 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c in VEGP Unit 3 Combined License (COL) Appendix C Table 3.3-6. The referenced ITAAC demonstrate that physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.

The ITAAC Closure Notifications (References 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and 13) summarize the methodology for conducting the Inspections/Tests/Analyses, and the results that demonstrate that the Main Control Room Emergency Habitability System (VES) cables meet the applicable separation criteria. These closure notifications are submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination bases are referenced in the closure notifications for Items 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c of VEGP Unit 3 COL Appendix C Table 3.3-6 and notifications are available for NRC inspection as part of the ITAAC Completion Package (Reference 14).

## **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.i [Index No. 799]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.a [Index No. 800]
3. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.b [Index No. 801]
4. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.c [Index No. 802]
5. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.a [Index No. 803]
6. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.b [Index No. 804]
7. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.c [Index No. 805]
8. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.a [Index No. 806]
9. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.b [Index No. 807]
10. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.c [Index No. 808]
11. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.a [Index No. 809]
12. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.b [Index No. 810]
13. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.c [Index No. 811]
14. ITAAC 2.2.05.06b Completion Package
15. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 2.3.02.02a [Index No. 285]**

**ITAAC Statement**

**Design Commitment**

- 2.a) *The components identified in Table 2.3.2-1 as ASME Code Section III are designed and constructed in accordance with ASME Code Section III requirements.*

**Inspections/Tests/Analyses**

*Inspection will be conducted of the as-built components as documented in the ASME design reports.*

**Acceptance Criteria**

*The ASME Code Section III design reports exist for the as-built components identified in Table 2.3.2-1 as ASME Code Section III.*

**ITAAC Completion Description**

An inspection is performed in accordance with the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (BPVC) Section III (Reference 1) to demonstrate that the as-built components identified in VEGP Unit 3 Combined License (COL) Appendix C Table 2.3.2-1 (Attachment A) as ASME Code Section III are designed and constructed in accordance with ASME Code Section III requirements.

Each component listed in Attachment A as ASME Code Section III is fabricated in accordance with the design and ASME Code Section III requirements. The ASME Code Section III Design Reports for these components exist and document that the as-built components conform to the approved design details. The ASME Section III Design Report for each component is documented in the component's completed ASME Section III Code Data Report. The individual ASME Section III Code Data Reports are documented on the ASME Section III N-5 Code Data Report for the Chemical and Volume Control System (Reference 2).

The as-built system, including the components listed in VEGP Unit 3 COL Appendix C Table 2.3.2-1 as ASME Code Section III, is subjected to a reconciliation process (Reference 3), which verifies that the as-built system has been analyzed for applicable loads (e.g. stress reports) and for compliance with all design specification and Code provisions. Design reconciliation of the as-built system validates that construction completion, including field changes and any nonconforming condition dispositions, is consistent with and bounded by the approved design. All applicable fabrication, installation and testing records, as well as those for the related QA verification and inspection activities, which confirm adequate construction in compliance with the ASME Code Section III and the design provisions, are referenced in the N-5 data report and/or its sub-tier references.

The ASME Section III N-5 Code Data Report, which includes the Design Reports for all the components listed in VEGP Unit 3 COL Appendix C Table 2.3.2-1 as ASME Code Section III, exists and concludes that these components have been designed and constructed in accordance with the ASME Code Section III requirements. The N-5 Code Data Report is

identified in Attachment A and is available for NRC inspection as part of the ITAAC Completion Package (Reference 4).

### **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

### **References (available for NRC inspection)**

1. American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (BPVC) Section III requirements as described in VEGP 3&4 Updated Final Safety Analysis Report, Section 5.2.1, Compliance with Codes and Code Cases
2. ASME Section III N-5 Code Data Report XXX for the Chemical and Volume Control System
3. APP-GW-GER-031, Revision 0, "AP1000 As-built Reconciliation Program for ASME Section III Components"
4. ITAAC 2.3.02.02a Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A: Excerpt from COL Appendix C Table 2.3.2-1

Equipment Name	Tag No.	ASME Code Section III Classification	N-5 Code Data Report
RCS Purification Motor- operated Isolation Valve	CVS-PL-V001	Yes	XXX
RCS Purification Motor- operated Isolation Valve	CVS-PL-V002	Yes	XXX
RCS Purification Motor- operated Isolation Valve	CVS-PL-V003	Yes	XXX
CVS Resin Flush Line Containment Isolation Valve	CVS-PL-V040	Yes	XXX
CVS Resin Flush Line Containment Isolation Valve	CVS-PL-V041	Yes	XXX
CVS Demineralizer Resin Flush Line Containment Isolation Thermal Relief Valve	CVS-PL-V042	Yes	XXX
CVS Letdown Containment Isolation Valve	CVS-PL-V045	Yes	XXX
CVS Letdown Containment Isolation Valve	CVS-PL-V047	Yes	XXX
CVS Letdown Line Containment Isolation Thermal Relief Valve	CVS-PL-V058	Yes	XXX
CVS Makeup Return Line Bypass Check Valve	CVS-PL-V067	Yes	XXX
CVS Purification Return Line Pressure Boundary Check Valve	CVS-PL-V080	Yes	XXX
CVS Purification Return Line Pressure Boundary Isolation Check Valve	CVS-PL-V081	Yes	XXX
CVS Purification Return Line Pressure Boundary Check Valve	CVS-PL-V082	Yes	XXX
CVS Auxiliary Pressurizer Spray Line Pressure Boundary Valve	CVS-PL-V084	Yes	XXX
CVS Auxiliary Pressurizer Spray Line Pressure Boundary Check Valve	CVS-PL-V085	Yes	XXX
CVS Makeup Line Containment Isolation Motor-operated Valve	CVS-PL-V090	Yes	XXX
CVS Makeup Line Containment Isolation Motor-operated Valve	CVS-PL-V091	Yes	XXX
CVS Zinc Injection Containment Isolation Valve ORC	CVS-PL-V092	Yes	XXX
CVS Zinc Injection Containment Isolation Valve IRC	CVS-PL-V094	Yes	XXX
CVS Zinc Addition Line Ctmt Isol Thermal Relief Valve	CVS-PL-V098	Yes	XXX
CVS Makeup Line Containment Isolation Thermal Relief Valve	CVS-PL-V100	Yes	XXX
CVS Demineralized Water Isolation Valve	CVS-PL-V136A	Yes	XXX
CVS Demineralized Water Isolation Valve	CVS-PL-V136B	Yes	XXX
CVS Hydrogen Injection Containment Isolation Check Valve IRC	CVS-PL-V217	Yes	XXX
CVS Hydrogen Injection Containment Isolation Valve ORC	CVS-PL-V219	Yes	XXX

**Subject: Uncompleted ITAAC 2.3.02.05.i [Index No. 291]**

**ITAAC Statement**

**Design Commitment**

5. *The seismic Category I equipment identified in Table 2.3.2-1 can withstand seismic design basis loads without loss of safety function.*

**Inspections/Tests/Analyses**

- i) *Inspection will be performed to verify that the seismic Category I equipment identified in Table 2.3.2-1 is located on the Nuclear Island.*

**Acceptance Criteria**

- i) *The seismic Category I equipment identified in Table 2.3.2-1 is located on the Nuclear Island.*

**ITAAC Completion Description**

Multiple ITAAC are performed to demonstrate that the seismic Category I equipment identified in VEGP Unit 3 Combined License (COL) Appendix C Table 2.3.2-1 (Attachment A) can withstand seismic design basis loads without loss of safety function. The subject ITAAC requires an inspection to verify that the seismic Category I equipment identified in Table 2.3.2-1 are located on the Nuclear Island, which is a Seismic Category I structure.

To assure that seismic Category I equipment can withstand seismic design basis loads without loss of safety function, all of the equipment in VEGP Unit 3 COL Appendix C Table 2.3.2-1 are designed to be located on the seismic Category I Nuclear Island. In accordance with Equipment Qualification (EQ) Walkdown Inspection Procedure XYZ (Reference 1), an inspection is conducted of the Chemical and Volume Control System (CVS) to confirm the satisfactory installation of the seismically qualified equipment. The inspection includes verification of equipment make/model/serial number and verification of equipment location (Building, Elevation, Room). The inspection to verify installed equipment locations is documented in the EQ As-Built Reconciliation Report(s) (Reference 2).

Attachment A identifies the EQ As-built Reconciliation Report(s) which verify that the installed location of the Seismic Category I equipment identified in VEGP Unit 3 COL Appendix C Table 2.3.2-1 is located on the Nuclear Island. The EQ As-Built Reconciliation Report(s) are available for NRC inspection as part of the ITAAC Completion Package (Reference 3).

**List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. EQ Walkdown Inspection Procedure XYZ
2. EQ As-Built Reconciliation Report(s) as identified in Attachment A
3. ITAAC 2.3.02.05.i Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A: Excerpt from COL Appendix C Table 2.3.2-1

ITAAC COMPLIANCE MATRIX FOR SEISMIC CATEGORY I EQUIPMENT  
(CHEMICAL AND VOLUME CONTROL SYSTEM)

Equipment Name	Tag No.	Seismic Cat. I	EQ As-Built Reconciliation Report(s)
RCS Purification Motor-operated Isolation Valve	CVS-PL-V001	Yes	XXX
RCS Purification Motor-operated Isolation Valve	CVS-PL-V002	Yes	XXX
RCS Purification Motor-operated Isolation Valve	CVS-PL-V003	Yes	XXX
CVS Resin Flush Line Containment Isolation Valve	CVS-PL-V040	Yes	XXX
CVS Resin Flush Line Containment Isolation Valve	CVS-PL-V041	Yes	XXX
CVS Demineralizer Resin Flush Line Containment Isolation Thermal Relief Valve	CVS-PL-V042	Yes	XXX
CVS Letdown Containment Isolation Valve	CVS-PL-V045	Yes	XXX
CVS Letdown Containment Isolation Valve	CVS-PL-V047	Yes	XXX
CVS Letdown Line Containment Isolation Thermal Relief Valve	CVS-PL-V058	Yes	XXX
CVS Makeup Return Line Bypass Check Valve	CVS-PL-V067	Yes	XXX
CVS Purification Return Line Pressure Boundary Check Valve	CVS-PL-V080	Yes	XXX
CVS Purification Return Line Pressure Boundary Isolation Check Valve	CVS-PL-V081	Yes	XXX
CVS Purification Return Line Pressure Boundary Check Valve	CVS-PL-V082	Yes	XXX
CVS Auxiliary Pressurizer Spray Line Pressure Boundary Valve	CVS-PL-V084	Yes	XXX
CVS Auxiliary Pressurizer Spray Line Pressure Boundary Check Valve	CVS-PL-V085	Yes	XXX
CVS Makeup Line Containment Isolation Motor-operated Valve	CVS-PL-V090	Yes	XXX
CVS Makeup Line Containment Isolation Motor-operated Valve	CVS-PL-V091	Yes	XXX
CVS Zinc Injection Containment Isolation Valve ORC	CVS-PL-V092	Yes	XXX
CVS Zinc Injection Containment Isolation Valve IRC	CVS-PL-V094	Yes	XXX
CVS Zinc Addition Line Ctmt Isol Thermal Relief Valve	CVS-PL-V098	Yes	XXX
CVS Makeup Line Containment Isolation Thermal Relief Valve	CVS-PL-V100	Yes	XXX
CVS Demineralized Water Isolation Valve	CVS-PL-V136A	Yes	XXX
CVS Demineralized Water Isolation Valve	CVS-PL-V136B	Yes	XXX
CVS Hydrogen Injection Containment Isolation Check Valve IRC	CVS-PL-V217	Yes	XXX



ND-16-0789  
Enclosure 2  
Completion Plans

Equipment Name	Tag No.	Seismic Cat. I	EQ As-Built Reconciliation Report(s)
CVS Hydrogen Injection Containment Isolation Valve ORC	CVS-PL-V219	Yes	XXX

**Subject: Uncompleted ITAAC 2.3.02.06c [Index No. 297]**

## **ITAAC Statement**

### **Design Commitment**

*6.c) Separation is provided between CVS Class 1E divisions, and between Class 1E divisions and non-Class 1E cable.*

### **Inspections/Tests/Analyses**

*See ITAAC Table 3.3-6, item 7.d.*

### **Acceptance Criteria**

*See ITAAC Table 3.3-6, item 7.d.*

## **ITAAC Completion Description**

This ITAAC Design Commitment is shown to be met by reference to ITAAC 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c in VEGP Unit 3 Combined License (COL) Appendix C Table 3.3-6. The referenced ITAAC demonstrate that physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.

The ITAAC Closure Notifications (References 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and 13) summarize the methodology for conducting the Inspections/Tests/Analyses, and the results that demonstrate that the Chemical and Volume Control System (CVS) cables meet the applicable separation criteria. These closure notifications are submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination bases are referenced in the closure notifications for Items 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c of VEGP Unit 3 COL Appendix C Table 3.3-6 and notifications are available for NRC inspection as part of the ITAAC Completion Package (Reference 14).

## **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.i [Index No. 799]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.a [Index No. 800]
3. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.b [Index No. 801]
4. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.c [Index No. 802]
5. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.a [Index No. 803]
6. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.b [Index No. 804]
7. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.c [Index No. 805]
8. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.a [Index No. 806]
9. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.b [Index No. 807]
10. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.c [Index No. 808]
11. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.a [Index No. 809]
12. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.b [Index No. 810]
13. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.c [Index No. 811]
14. ITAAC 2.3.02.06c Completion Package
15. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 2.3.02.07b [Index No. 299]**

**ITAAC Statement**

**Design Commitment**

7.b) *The CVS provides termination of an inadvertent RCS boron dilution by isolating demineralized water from the RCS.*

**Inspections/Tests/Analyses**

*See item 10b in this table.*

**Acceptance Criteria**

*See item 10b in this table.*

**ITAAC Completion Description**

This ITAAC Design Commitment is shown to be met by reference to ITAAC items 10b.i and 10b.ii in VEGP Unit 3 Combined License (COL), Appendix C, Table 2.3.2-4. Item 10b.i tests the active function of valves having Protection and Safety Monitoring System (PMS) control in VEGP Unit 3 COL, Appendix C, Table 2.3.2-1, and Item 10b.ii performs tests to demonstrate that the remotely operated Chemical and Volume Control System (CVS) isolation valves CVS-V090, V091, and V136A/B close within the required response time.

The closure notifications (References 1 and 2) summarize the methodology for item 10b from ITAAC table 2.3.2-4 for conducting the inspections, tests, or analyses (ITA) and the results that demonstrate that the acceptance criteria are met. These closure notifications are submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination basis are referenced in the closure notifications for items 10b.i and 10b.ii of VEGP Unit 3 COL, Appendix C, Table 2.3.2-4 and are available for NRC inspection as part of the ITAAC Completion Package (Reference 3).

**List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.3.02.10b.i [Index No. 307]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.3.02.10b.ii [Index No. 308]
3. ITAAC 2.3.02.07b Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 2.3.02.07c [Index No. 300]**

**ITAAC Statement**

**Design Commitment**

7.c) *The CVS provides isolation of makeup to the RCS.*

**Inspections/Tests/Analyses**

*See item 10b in this table.*

**Acceptance Criteria**

*See item 10b in this table.*

**ITAAC Completion Description**

This ITAAC Design Commitment is shown to be met by reference to ITAAC items 10b.i and 10b.ii in VEGP Unit 3 Combined License (COL), Appendix C, Table 2.3.2-4. Item 10b.i tests the active function of valves having Protection and Safety Monitoring System (PMS) controls in VEGP Unit 3 COL Appendix C Table 2.3.2-1, and Item 10b.ii performs tests to demonstrate that the remotely operated Chemical and Volume Control System (CVS) isolation valves CVS-V090, V091, and V136A/B close within the required response time.

The closure notifications (References 1 and 2) summarize the methodology for item 10b from VEGP Unit 3 COL, Appendix C, ITAAC table 2.3.2-4 for conducting the inspections, tests, or analyses (ITA) and the results that demonstrate that the acceptance criteria are met. These closure notifications are submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination basis are referenced in the closure notifications for items 10b.i and 10b.ii of VEGP Unit 3 COL, Appendix C, Table 2.3.2-4, and are available for NRC inspection as part of the ITAAC Completion Package (Reference 3).

**List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.3.02.10b.i [Index No. 307]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.3.02.10b.ii [Index No. 308]
3. ITAAC 2.3.02.07c Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 2.3.06.07c [Index No. 369]**

**ITAAC Statement**

**Design Commitment**

7.c) *Separation is provided between RNS Class 1E divisions, and between Class 1E divisions and non-Class 1E cable.*

**Inspections/Tests/Analyses**

*See ITAAC Table 3.3-6, item 7.d.*

**Acceptance Criteria**

*See ITAAC Table 3.3-6, item 7.d.*

**ITAAC Completion Description**

This ITAAC Design Commitment is shown to be met by reference to ITAAC 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c in VEGP Unit 3 Combined License (COL) Appendix C Table 3.3-6. The referenced ITAAC demonstrate that physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.

The ITAAC Closure Notifications (References 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and 13) summarize the methodology for conducting the Inspections/Tests/Analyses and the results that demonstrate that the Normal Residual Heat Removal System (RNS) cables meet the applicable separation criteria. These closure notifications are submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination bases are referenced in the closure notifications for Items 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c of VEGP Unit 3 COL Appendix C Table 3.3-6 and notifications are available for NRC inspection as part of the ITAAC Completion Package (Reference 14).

**List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.



**References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.i [Index No. 799]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.a [Index No. 800]
3. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.b [Index No. 801]
4. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.c [Index No. 802]
5. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.a [Index No. 803]
6. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.b [Index No. 804]
7. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.c [Index No. 805]
8. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.a [Index No. 806]
9. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.b [Index No. 807]
10. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.c [Index No. 808]
11. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.a [Index No. 809]
12. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.b [Index No. 810]
13. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.c [Index No. 811]
14. ITAAC 2.3.06.07c Completion Package
15. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 2.3.07.06b [Index No. 400]**

**ITAAC Statement**

**Design Commitment**

6.b) *Separation is provided between SFS Class 1E divisions, and between Class 1E divisions and non-Class 1E cable.*

**Inspections/Tests/Analyses**

*See ITAAC Table 3.3-6, item 7.d.*

**Acceptance Criteria**

*See ITAAC Table 3.3-6, item 7.d.*

**ITAAC Completion Description**

This ITAAC Design Commitment is shown to be met by reference to ITAAC 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c in VEGP Unit 3 Combined License (COL) Appendix C Table 3.3-6. The referenced ITAAC demonstrate that physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.

The ITAAC Closure Notifications (References 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and 13) summarize the methodology for conducting the Inspections/Tests/Analyses and the results that demonstrate that the Spent Fuel Pool Cooling System (SFS) cables meet the applicable separation criteria. These closure notifications are submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination bases are referenced in the closure notifications for Items 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c of VEGP Unit 3 COL Appendix C Table 3.3-6 and notifications are available for NRC inspection as part of the ITAAC Completion Package (Reference 14).

**List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.i [Index No. 799]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.a [Index No. 800]
3. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.b [Index No. 801]
4. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.c [Index No. 802]
5. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.a [Index No. 803]
6. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.b [Index No. 804]
7. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.c [Index No. 805]
8. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.a [Index No. 806]
9. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.b [Index No. 807]
10. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.c [Index No. 808]
11. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.a [Index No. 809]
12. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.b [Index No. 810]
13. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.c [Index No. 811]
14. ITAAC 2.3.07.06b Completion Package
15. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 2.3.10.02a [Index No. 431]**

**ITAAC Statement**

**Design Commitment**

- 2.a) *The components identified in Table 2.3.10-1 as ASME Code Section III are designed and constructed in accordance with ASME Code Section III requirements.*

**Inspections/Tests/Analyses**

*Inspection will be conducted of the as-built components as documented in the ASME design reports.*

**Acceptance Criteria**

*The ASME Code Section III design report exists for the as built components identified in Table 2.3.10-1 as ASME Code Section III.*

**ITAAC Completion Description**

An inspection is performed in accordance with the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (BPVC) Section III (Reference 1) to demonstrate that the as-built components identified in VEGP Unit 3 Combined License (COL) Appendix C Table 2.3.10-1 (Attachment A) as ASME Code Section III are designed and constructed in accordance with ASME Code Section III requirements.

Each component listed in Attachment A as ASME Code Section III is fabricated in accordance with the design and ASME Code Section III requirements. The ASME Code Section III Design Reports for these components exist and document that the as-built components conform to the approved design details. The ASME Section III Design Report for each component is documented in the component's completed ASME Section III Code Data Report. The individual ASME Section III Code Data Reports are documented on the ASME Section III N-5 Code Data Report for the Liquid Radwaste System (Reference 2).

The as-built system, including the components listed in VEGP Unit 3 COL Appendix C Table 2.3.10-1 as ASME Code Section III, is subjected to a reconciliation process (Reference 3), which verifies that the as-built system has been analyzed for applicable loads (e.g. stress reports) and for compliance with all design specification and Code provisions. Design reconciliation of the as-built system validates that construction completion, including field changes and any nonconforming condition dispositions, is consistent with and bounded by the approved design. All applicable fabrication, installation and testing records, as well as those for the related QA verification and inspection activities, which confirm adequate construction in compliance with the ASME Code Section III and the design provisions, are referenced in the N-5 data report and/or its sub-tier references.

The ASME Section III N-5 Code Data Report, which includes the Design Reports for all the components listed in VEGP Unit 3 COL Appendix C Table 2.3.10-1 as ASME Code Section III, exists and concludes that these components have been designed and constructed in accordance with the ASME Code Section III requirements. The N-5 Code Data Report is

identified in Attachment A and is available for NRC inspection as part of the ITAAC Completion Package (Reference 4).

### **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

### **References (available for NRC inspection)**

1. American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (BPVC) Section III requirements as described in VEGP 3&4 Updated Final Safety Analysis Report, Section 5.2.1, Compliance with Codes and Code Cases
2. ASME Section III N-5 Code Data Report XXX for the Liquid Radwaste System
3. APP-GW-GER-031, Revision 0, "AP1000 As-built Reconciliation Program for ASME Section III Components"
4. ITAAC 2.3.10.02a Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A: Excerpt from COL Appendix C Table 2.3.10-1

<b>Equipment Name</b>	<b>Tag No.</b>	<b>ASME Code Section III Classification</b>	<b>N-5 Code Data Report</b>
WLS Drain from Passive Core Cooling System (PXS) Compartment A (Room 11206) Check Valve	WLS-PL-V071B	Yes	XXX
WLS Drain from PXS Compartment A (Room 11206) Check Valve	WLS-PL-V072B	Yes	XXX
WLS Drain from PXS Compartment B (Room 11207) Check Valve	WLS-PL-V071C	Yes	XXX
WLS Drain from PXS Compartment B (Room 11207) Check Valve	WLS-PL-V072C	Yes	XXX
WLS Drain from Chemical and Volume Control System (CVS) Compartment (Room 11209) Check Valve	WLS-PL-V071A	Yes	XXX
WLS Drain from CVS Compartment (Room 11209) Check Valve	WLS-PL-V072A	Yes	XXX

**Subject: Uncompleted ITAAC 2.3.13.06c [Index No. 468]**

**ITAAC Statement**

**Design Commitment**

6.c) *Separation is provided between PSS Class 1E divisions, and between Class 1E divisions and non-Class 1E cable.*

**Inspections/Tests/Analyses**

*See ITAAC Table 3.3-6, item 7.d.*

**Acceptance Criteria**

*See ITAAC Table 3.3-6, item 7.d.*

**ITAAC Completion Description**

This ITAAC Design Commitment is shown to be met by reference to ITAAC 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c in VEGP Unit 3 Combined License (COL) Appendix C Table 3.3-6. The referenced ITAAC demonstrate that physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.

The ITAAC Closure Notifications (References 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and 13) summarize the methodology for conducting the Inspections/Tests/Analyses and the results that demonstrate that the Primary Sampling System (PSS) cables meet the applicable separation criteria. These closure notifications are submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination bases are referenced in the closure notifications for Items 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c of VEGP Unit 3 COL Appendix C Table 3.3-6 and notifications are available for NRC inspection as part of the ITAAC Completion Package (Reference 14).

**List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.i [Index No. 799]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.a [Index No. 800]
3. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.b [Index No. 801]
4. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.c [Index No. 802]
5. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.a [Index No. 803]
6. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.b [Index No. 804]
7. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.c [Index No. 805]
8. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.a [Index No. 806]
9. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.b [Index No. 807]
10. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.c [Index No. 808]
11. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.a [Index No. 809]
12. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.b [Index No. 810]
13. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.c [Index No. 811]
14. ITAAC 2.3.13.06c Completion Package
15. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"



**Subject: Uncompleted ITAAC 2.3.19.01b [Index No. 485]**

**ITAAC Statement**

**Design Commitment**

1.b) *The EFS has sound-powered equipment connected as a system.*

**Inspections/Tests/Analyses**

*Inspection of the as-built system will be performed.*

**Acceptance Criteria**

*The as-built EFS has sound-powered equipment connected as a system.*

**ITAAC Completion Description**

The subject ITAAC requires that an inspection of the as-built communication system (EFS) be performed to demonstrate that the EFS has sound-powered equipment connected as a system. The inspection is completed in accordance with Walkdown Inspection Procedure XYZ (Reference 1), which requires the preparation of a detailed inspection plan, performance of visual observations that compare the as-built system to the design, and documentation of the visual observations.

The inspection verifies that the as-built EFS has sound-powered equipment connected as a system, as documented in the Walkdown Inspection Report XXX (Reference 2). This inspection report is available for NRC inspection as part of the ITAAC Completion Package (Reference 3).

**List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. Walkdown Inspection Procedure XYZ
2. Walkdown Inspection Report XXX
3. ITAAC 2.3.19.01b Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 2.5.02.05b [Index No. 528]**

**ITAAC Statement**

**Design Commitment**

5.b) *Separation is provided between PMS Class 1E divisions, and between Class 1E divisions and non-Class 1E cable.*

**Inspections/Tests/Analyses**

*See ITAAC Table 3.3-6, items 7.d and 7.e.*

**Acceptance Criteria**

*See ITAAC Table 3.3-6, items 7.d and 7.e.*

**ITAAC Completion Description**

This ITAAC Design Commitment is shown to be met by reference to ITAAC 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, 7d.v.c and 7e in VEGP Unit 3 Combined License (COL) Appendix C Table 3.3-6. The referenced ITAAC demonstrate that physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.

The ITAAC Closure Notifications (References 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, and 14) summarize the methodology for conducting the Inspections/Tests/Analyses and the results that demonstrate that the Protection and Safety Monitoring System (PMS) cables meet the applicable separation criteria. These closure notifications are submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination bases are referenced in the closure notifications for Items 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, 7d.v.c and 7e of VEGP Unit 3 COL Appendix C Table 3.3-6 and notifications are available for NRC inspection as part of the ITAAC Completion Package (Reference 15).

**List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.i [Index No. 799]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.a [Index No. 800]
3. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.b [Index No. 801]
4. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.c [Index No. 802]
5. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.a [Index No. 803]
6. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.b [Index No. 804]
7. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.c [Index No. 805]
8. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.a [Index No. 806]
9. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.b [Index No. 807]
10. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.c [Index No. 808]
11. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.a [Index No. 809]
12. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.b [Index No. 810]
13. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.c [Index No. 811]
14. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07e [Index No. 812]
15. ITAAC 2.5.02.05b Completion Package
16. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 2.5.05.03c [Index No. 571]**

**ITAAC Statement**

**Design Commitment**

3.c) *For cables other than those covered by 3.b, separation is provided between IIS Class 1E divisions, and between Class 1E divisions and non-Class 1E cable.*

**Inspections/Tests/Analyses**

*See ITAAC Table 3.3-6, item 7.d.*

**Acceptance Criteria**

*See ITAAC Table 3.3-6, item 7.d.*

**ITAAC Completion Description**

This ITAAC Design Commitment is shown to be met by reference to ITAAC 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c in VEGP Unit 3 Combined License (COL) Appendix C Table 3.3-6. The referenced ITAAC demonstrate that physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.

The ITAAC Closure Notifications (References 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and 13) summarize the methodology for conducting the Inspections/Tests/Analyses and the results that demonstrate that the In-core Instrumentation System (IIS) cables meet the applicable separation criteria. These closure notifications are submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination bases are referenced in the closure notifications for Items 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c of VEGP Unit 3 COL Appendix C Table 3.3-6 and notifications are available for NRC inspection as part of the ITAAC Completion Package (Reference 14).

**List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.i [Index No. 799]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.a [Index No. 800]
3. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.b [Index No. 801]
4. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.c [Index No. 802]
5. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.a [Index No. 803]
6. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.b [Index No. 804]
7. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.c [Index No. 805]
8. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.a [Index No. 806]
9. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.b [Index No. 807]
10. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.c [Index No. 808]
11. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.a [Index No. 809]
12. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.b [Index No. 810]
13. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.c [Index No. 811]
14. ITAAC 2.5.05.03c Completion Package
15. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 2.6.01.03b [Index No. 583]**

**ITAAC Statement**

**Design Commitment**

3.b) *Separation is provided between ECS Class 1E divisions, and between Class 1E divisions and non-Class 1E cable.*

**Inspections/Tests/Analyses**

*See ITAAC Table 3.3-6, item 7.d.*

**Acceptance Criteria**

*See ITAAC Table 3.3-6, item 7.d.*

**ITAAC Completion Description**

This ITAAC Design Commitment is shown to be met by reference to ITAAC 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c in VEGP Unit 3 Combined License (COL) Appendix C Table 3.3-6. The referenced ITAAC demonstrate that physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.

The ITAAC Closure Notifications (References 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and 13) summarize the methodology for conducting the Inspections/Tests/Analyses and the results that demonstrate that the Main AC Power System (ECS) cables meet the applicable separation criteria. These closure notifications are submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination bases are referenced in the closure notifications for Items 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c of VEGP Unit 3 COL Appendix C Table 3.3-6 and notifications are available for NRC inspection as part of the ITAAC Completion Package (Reference 14).

**List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.i [Index No. 799]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.a [Index No. 800]
3. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.b [Index No. 801]
4. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.c [Index No. 802]
5. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.a [Index No. 803]
6. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.b [Index No. 804]
7. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.c [Index No. 805]
8. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.a [Index No. 806]
9. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.b [Index No. 807]
10. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.c [Index No. 808]
11. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.a [Index No. 809]
12. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.b [Index No. 810]
13. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.c [Index No. 811]
14. ITAAC 2.6.01.03b Completion Package
15. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 2.6.03.03 [Index No. 600]**

**ITAAC Statement**

**Design Commitment**

3. *Separation is provided between IDS Class 1E divisions, and between Class 1E divisions and non-Class 1E cable.*

**Inspections/Tests/Analyses**

*See ITAAC Table 3.3-6, item 7.d.*

**Acceptance Criteria**

*See ITAAC Table 3.3-6, item 7.d.*

**ITAAC Completion Description**

This ITAAC Design Commitment is shown to be met by reference to ITAAC 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c in VEGP Unit 3 Combined License (COL) Appendix C Table 3.3-6. The referenced ITAAC demonstrate that physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.

The ITAAC Closure Notifications (References 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and 13) summarize the methodology for conducting the Inspections/Tests/Analyses and the results that demonstrate that the Class 1E DC and Uninterruptible Power Supply System (IDS) (Division A to D) cables meet the applicable separation criteria. These closure notifications are submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination bases are referenced in the closure notifications for Items 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c of VEGP Unit 3 COL Appendix C Table 3.3-6 and notifications are available for NRC inspection as part of the ITAAC Completion Package (Reference 14).

**List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.



**References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.i [Index No. 799]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.a [Index No. 800]
3. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.b [Index No. 801]
4. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.c [Index No. 802]
5. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.a [Index No. 803]
6. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.b [Index No. 804]
7. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.c [Index No. 805]
8. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.a [Index No. 806]
9. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.b [Index No. 807]
10. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.c [Index No. 808]
11. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.a [Index No. 809]
12. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.b [Index No. 810]
13. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.c [Index No. 811]
14. ITAAC 2.6.03.03 Completion Package
15. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 2.6.05.04 [Index No. 632]**

### **ITAAC Statement**

#### **Design Commitment**

4. *The panel lighting circuits are classified as associated and treated as Class 1E. These lighting circuits are routed with the Divisions B and C Class 1E circuits. Separation is provided between ELS associated divisions and between associated divisions and non-Class 1E cable.*

#### **Inspections/Tests/Analyses**

*See ITAAC Table 3.3-6, item 7.d.*

#### **Acceptance Criteria**

*See ITAAC Table 3.3-6, item 7.d.*

### **ITAAC Completion Description**

This ITAAC Design Commitment is shown to be met by reference to ITAAC 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c in VEGP Unit 3 Combined License (COL) Appendix C Table 3.3-6. The referenced ITAAC demonstrate that physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.

The ITAAC Closure Notifications (References 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and 13) summarize the methodology for conducting the Inspections/Tests/Analyses and the results that demonstrate that the Plant Lighting System (ELS) cables meet the applicable separation criteria. These closure notifications are submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination bases are referenced in the closure notifications for Items 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c of VEGP Unit 3 COL Appendix C Table 3.3-6 and notifications are available for NRC inspection as part of the ITAAC Completion Package (Reference 14).

### **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and

associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.i [Index No. 799]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.a [Index No. 800]
3. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.b [Index No. 801]
4. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.c [Index No. 802]
5. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.a [Index No. 803]
6. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.b [Index No. 804]
7. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.c [Index No. 805]
8. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.a [Index No. 806]
9. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.b [Index No. 807]
10. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.c [Index No. 808]
11. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.a [Index No. 809]
12. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.b [Index No. 810]
13. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.c [Index No. 811]
14. ITAAC 2.6.05.04 Completion Package
15. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 2.7.01.02a [Index No. 678]**

**ITAAC Statement**

**Design Commitment**

- 2.a) *The components identified in Table 2.7.1-1 as ASME Code Section III are designed and constructed in accordance with ASME Code Section III requirements.*

**Inspections/Tests/Analyses**

*Inspection will be conducted of the as-built components as documented in the ASME design reports.*

**Acceptance Criteria**

*The ASME Code Section III design reports exist for the as-built components identified in Table 2.7.1-1 as ASME Code Section III.*

**ITAAC Completion Description**

An inspection is performed in accordance with the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (BPVC) Section III (Reference 1) to demonstrate that the as-built components identified in VEGP Unit 3 Combined License (COL) Appendix C Table 2.7.1-1 (Attachment A) as ASME Code Section III are designed and constructed in accordance with ASME Code Section III requirements.

Each component listed in Attachment A as ASME Code Section III is fabricated in accordance with the design and ASME Code Section III requirements. The ASME Code Section III Design Reports for these components exist and document that the as-built components conform to the approved design details. The ASME Section III Design Report for each component is documented in the component's completed ASME Section III Code Data Report. The individual ASME Section III Code Data Reports are documented on the ASME Section III N-5 Code Data Report for the applicable piping system(s) (Reference 2).

The as-built system including the components listed in VEGP Unit 3 COL Appendix C Table 2.7.1-1 as ASME Code Section III, is subjected to a reconciliation process (Reference 3), which verifies that the as-built system has been analyzed for applicable loads (e.g. stress reports) and for compliance with all design specification and Code provisions. Design reconciliation of the as-built system validates that construction completion, including field changes and any nonconforming condition dispositions, is consistent with and bounded by the approved design. All applicable fabrication, installation and testing records, as well as those for the related QA verification and inspection activities, which confirm adequate construction in compliance with the ASME Code Section III and the design provisions, are referenced in the N-5 data report and/or its sub-tier references.

The ASME Section III N-5 Code Data Report(s), which include the Design Reports for all the components listed in VEGP Unit 3 COL Appendix C Table 2.7.1-1 as ASME Code Section III, exist and conclude that these components have been designed and constructed in accordance with the ASME Code Section III requirements. The N-5 Code Data Report(s) are identified in

Attachment A and are available for NRC inspection as part of the ITAAC Completion Package (Reference 4).

### **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

### **References (available for NRC inspection)**

1. American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (BPVC) Section III requirements as described in VEGP 3&4 Updated Final Safety Analysis Report, Section 5.2.1, Compliance with Codes and Code Cases
2. ASME Section III N-5 Code Data Report XXX for the applicable piping system(s)
3. APP-GW-GER-031, Revision 0, "AP1000 As-built Reconciliation Program for ASME Section III Components"
4. ITAAC 2.7.01.02a Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A: Excerpt from COL Appendix C Table 2.7.1-1

<b>Equipment Name</b>	<b>Tag No.</b>	<b>ASME Code Section III Classification</b>	<b>N-5 Code Data Report</b>
MCR Supply Air Isolation Valve	VBS-PL-V186	Yes	XXX
MCR Supply Air Isolation Valve	VBS-PL-V187	Yes	XXX
MCR Return Air Isolation Valve	VBS-PL-V188	Yes	XXX
MCR Return Air Isolation Valve	VBS-PL-V189	Yes	XXX
MCR Exhaust Air Isolation Valve	VBS-PL-V190	Yes	XXX
MCR Exhaust Air Isolation Valve	VBS-PL-V191	Yes	XXX
PWS MCR Isolation Valve	PWS-PL-V418	Yes	XXX
PWS MCR Isolation Valve	PWS-PL-V420	Yes	XXX
PWS MCR Vacuum Relief	PWS-PL-V498	Yes	XXX
MCR SDS (Vent) Isolation Valve	SDS-PL-V001	Yes	XXX
MCR SDS (Vent) Isolation Valve	SDS-PL-V002	Yes	XXX
MCR WWS Isolation Valve	WWS-PL-V506	Yes	XXX

**Subject: Uncompleted ITAAC 2.7.01.06b [Index No. 688]**

**ITAAC Statement**

**Design Commitment**

6.b) *Separation is provided between VBS Class 1E divisions, and between Class 1E divisions and non-Class 1E cable.*

**Inspections/Tests/Analyses**

*See ITAAC Table 3.3-6, item 7.d.*

**Acceptance Criteria**

*See ITAAC Table 3.3-6, item 7.d.*

**ITAAC Completion Description**

This ITAAC Design Commitment is shown to be met by reference to ITAAC 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c in VEGP Unit 3 Combined License (COL) Appendix C Table 3.3-6. The referenced ITAAC demonstrate that physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.

The ITAAC Closure Notifications (References 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and 13) summarize the methodology for conducting the Inspections/Tests/Analyses and the results that demonstrate that the Nuclear Island Nonradioactive Ventilation System (VBS) cables meet the applicable separation criteria. These closure notifications are submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination bases are referenced in the closure notifications for Items 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c of VEGP Unit 3 COL Appendix C Table 3.3-6 and notifications are available for NRC inspection as part of the ITAAC Completion Package (Reference 14).

**List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.i [Index No. 799]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.a [Index No. 800]
3. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.b [Index No. 801]
4. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.c [Index No. 802]
5. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.a [Index No. 803]
6. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.b [Index No. 804]
7. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.c [Index No. 805]
8. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.a [Index No. 806]
9. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.b [Index No. 807]
10. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.c [Index No. 808]
11. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.a [Index No. 809]
12. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.b [Index No. 810]
13. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.c [Index No. 811]
14. ITAAC 2.7.01.06b Completion Package
15. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"



**Subject: Uncompleted ITAAC 2.7.01.08a [Index No. 690]**

**ITAAC Statement**

**Design Commitment**

*8.a) The VBS provides cooling to the MCR, CSA, RSR, and Class 1E electrical rooms.*

**Inspections/Tests/Analyses**

*See item 12 in this table.*

**Acceptance Criteria**

*See item 12 in this table.*

**ITAAC Completion Description**

This ITAAC Design Commitment is met by reference to ITAAC Item 12 in VEGP Unit 3 Combined License (COL) Appendix C Table 2.7.1-4. Item 12 performs testing on the components in VEGP Unit 3 Combined License (COL) Appendix C Table 2.7.1-3 using controls in the main control room (MCR).

The closure notification (Reference 1) for Item 12 in VEGP Unit 3 COL Appendix C Table 2.7.1-4 summarizes the methodology for conducting the testing and the results that demonstrate that the acceptance criteria are satisfied. This closure notification is submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination basis are referenced in the closure notification for Item 12 of VEGP Unit 3 COL Appendix C Table 2.7.1-4 and are available for NRC inspection as part of the ITAAC Completion Package (Reference 2).

**List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.7.01.12 [Index No. 698]
2. ITAAC 2.7.01.08a Completion Package
3. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 2.7.01.08b [Index No. 691]**

**ITAAC Statement**

**Design Commitment**

*8.b) The VBS provides ventilation cooling to the Class 1E battery rooms.*

**Inspections/Tests/Analyses**

*See item 12 in this table.*

**Acceptance Criteria**

*See item 12 in this table.*

**ITAAC Completion Description**

This ITAAC Design Commitment is met by reference to ITAAC Item 12 in VEGP Unit 3 Combined License (COL) Appendix C Table 2.7.1-4. Item 12 performs testing of the Class 1E battery rooms components in VEGP Unit 3 COL Appendix C Table 2.7.1-3 using controls in the main control room (MCR). The tests verify that the controls in the MCR operate to cause the components listed in Table 2.7.1-3 to perform the listed functions.

The closure notification (Reference 1) Item 12 in VEGP Unit 3 COL Appendix C Table 2.7.1-4 summarizes the methodology for conducting the testing and the results that demonstrate that the acceptance criteria are satisfied. This closure notification is submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination basis are referenced in the closure notification for Item 12 of VEGP Unit 3 COL Appendix C Table 2.7.1-4 and are available for NRC inspection as part of the ITAAC Completion Package (Reference 2).

**List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.7.01.12 [Index No.698]
2. ITAAC 2.7.01.08b Completion Package
3. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 2.7.01.08c [Index No. 692]**

**ITAAC Statement**

**Design Commitment**

8.c) *The VBS maintains MCR and CSA habitability when radioactivity is detected.*

**Inspections/Tests/Analyses**

*See item 12 in this table.*

**Acceptance Criteria**

*See item 12 in this table.*

**ITAAC Completion Description**

This ITAAC Design Commitment is met by reference to ITAAC Item 12 in VEGP Unit 3 Combined License (COL) Appendix C Table 2.7.1-4. Item 12 performs testing of the components in Table 2.7.1-3 using controls in the main control room (MCR). The controls in the MCR operate to cause the components listed in Table 2.7.1-3 to perform the listed functions.

The closure notification (Reference 1) Item 12 in VEGP Unit 3 COL Appendix C Table 2.7.1-4 summarizes the methodology for conducting the testing and the results that demonstrate that the acceptance criteria are satisfied. This closure notification is submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination basis are referenced in the closure notification for Item 12 of VEGP Unit 3 COL Appendix C Table 2.7.1-4 and are available for NRC inspection as part of the ITAAC Completion Package (Reference 2).

**List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.7.01.12 [Index No. 698]
2. ITAAC 2.7.01.08c Completion Package
3. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 2.7.06.03.iii [Index No. 728]**

**ITAAC Statement**

**Design Commitment**

3. *The VFS provides the intermittent flow of outdoor air to purge the containment atmosphere during normal plant operation, and continuous flow during hot or cold plant shutdown conditions.*

**Inspections/Tests/Analyses**

- iii) *Inspection will be conducted of the containment purge discharge line (VFS-L204) penetrating the containment.*

**Acceptance Criteria**

- iii) *The nominal line size is  $\geq 36$  in.*

**ITAAC Completion Description**

Multiple ITAAC are performed to confirm that the Containment Air Filtration System (VFS) provides the intermittent flow of outdoor air to purge the containment atmosphere during normal plant operation, and continuous flow during hot or cold plant shutdown conditions. The subject ITAAC requires an inspection be conducted of the containment purge discharge line (VFS-L204) penetrating the containment to confirm it has a nominal line size that is  $\geq 36$  in.

This inspection is performed in accordance with Inspection Procedure YYY (Reference 1). The inspection results are documented in Inspection Report XXX (Reference 2) and confirm that the containment purge discharge line (VFS-L204) penetrating the containment has a nominal line size that is  $\geq 36$  in. The Inspection Report is available for NRC inspection as part of the ITAAC Completion Package (Reference 3).

**List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. Inspection Procedure YYY
2. Inspection Report XXX
3. ITAAC 2.7.06.03.iii Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"



**Subject: Uncompleted ITAAC 3.5.00.03 [Index No. 828]**

**ITAAC Statement**

**Design Commitment**

3. *Separation is provided between RMS Class 1E divisions, and between Class 1E divisions and non-Class 1E cable.*

**Inspections/Tests/Analyses**

*See ITAAC Table 3.3-6, item 7.d).*

**Acceptance Criteria**

*See ITAAC Table 3.3-6, item 7.d).*

**ITAAC Completion Description**

This ITAAC Design Commitment is shown to be met by reference to ITAAC 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c in VEGP Unit 3 Combined License (COL) Appendix C Table 3.3-6. The referenced ITAAC demonstrate that physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.

The ITAAC Closure Notifications (References 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, and 13) summarize the methodology for conducting the Inspections/Tests/Analyses and the results that demonstrate that the Radiation Monitoring System (RMS) cables meet the applicable separation criteria. These closure notifications are submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination bases are referenced in the closure notifications for Items 7d.i, 7d.ii.a, 7d.ii.b, 7d.ii.c, 7d.iii.a, 7d.iii.b, 7d.iii.c, 7d.iv.a, 7d.iv.b, 7d.iv.c, 7d.v.a, 7d.v.b, and 7d.v.c of VEGP Unit 3 COL Appendix C Table 3.3-6 and notifications are available for NRC inspection as part of the ITAAC Completion Package (Reference 14).

**List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.i [Index No. 799]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.a [Index No. 800]
3. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.b [Index No. 801]
4. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.ii.c [Index No. 802]
5. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.a [Index No. 803]
6. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.b [Index No. 804]
7. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iii.c [Index No. 805]
8. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.a [Index No. 806]
9. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.b [Index No. 807]
10. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.c [Index No. 808]
11. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.a [Index No. 809]
12. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.b [Index No. 810]
13. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.v.c [Index No. 811]
14. ITAAC 3.5.00.03 Completion Package
15. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 3.6.00.01.i [Index No. 834]**

**ITAAC Statement**

**Design Commitment**

- 1.) *The diverse leak detection methods provide the nonsafety-related function of detecting small leaks when RCS leakage indicates possible reactor coolant pressure boundary degradation.*

**Inspections/Tests/Analyses**

*See sections:*

- i) *See ITAAC Table 2.3.10-4, Item 7.a for the sump level measuring instruments WLS-034 and WLS-035.*

**Acceptance Criteria**

*See sections:*

- i) *See ITAAC Table 2.3.10-4, Item 7.a for the sump level measuring instruments WLS-034 and WLS-035.*

**ITAAC Completion Description**

Multiple ITAAC are performed to demonstrate diverse leak detection methods provide the nonsafety-related function of detecting small leaks when Reactor Coolant System (RCS) leakage indicates possible reactor coolant pressure boundary degradation. This ITAAC is met by reference to ITAAC items 7a.i and 7a.ii in VEGP Unit 3 Combined License (COL) Appendix C Table 2.3.10-4. Item 7a.i inspects for retrievability of the displays of containment sump level channels WLS-034, WLS-035, and WLS-036 in the Main Control Room and Item 7a.ii performs a test to demonstrate that sump level channels WLS-034, WLS-035, and WLS-036 can detect a change of  $1.75 \pm 0.1$  inches of containment sump level.

The closure notifications (References 1 and 2) for the ITAAC for VEGP Unit 3 COL Appendix C Table 2.3.10-4 Items 7a.i and 7a.ii summarize the methodology for conducting the inspections and tests, and the results that demonstrate that the acceptance criteria are met. These closure notifications are submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination bases are referenced in the closure notifications for items 7a.i and 7a.ii from VEGP Unit 3 COL Appendix C Table 2.3.10-4 and are available for NRC inspection as part of the ITAAC Completion Package (Reference 3).

### **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

### **References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.3.10.07a.i [Index No. 443]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.3.10.07a.ii [Index No. 444]
3. ITAAC 3.6.00.01.i Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 3.6.00.01.ii [Index No. 835]**

**ITAAC Statement**

**Design Commitment**

1. *The diverse leak detection methods provide the nonsafety-related function of detecting small leaks when RCS leakage indicates possible reactor coolant pressure boundary degradation.*

**Inspections/Tests/Analyses**

*See sections:*

- ii) *See ITAAC Table 3.5-6, Item 1 for the containment atmosphere radioactivity monitor PSS-RE027.*

**Acceptance Criteria**

*See ITAAC sections:*

- ii) *See ITAAC Table 3.5-6, Item 1 for the containment atmosphere radioactivity monitor PSS-RE027.*

**ITAAC Completion Description**

This ITAAC Design Commitment is shown to be met by reference to ITAAC items 1.i, 1.ii and 1.iii in VEGP Unit 3 Combined License (COL) Appendix C Table 3.5-6. The reference is to items 1.i, 1.ii, and 1.iii of VEGP Unit 3 COL Appendix C Table 3.5-6. Item 1.i verifies that Seismic Category I equipment identified in VEGP Unit 3 COL Appendix C Table 3.5-1 is located on the Nuclear Island. Item 1.ii verifies that a report that exists and concludes that the seismic Category I equipment identified in VEGP Unit 3 COL Appendix C Table 3.5-1 can withstand seismic design basis loads without loss of safety function. Item 1.iii verifies that a report exists and concludes that the as-built equipment identified in VEGP Unit 3 COL Appendix C Table 3.5-1, including anchorage, is seismically bounded by the tested or analyzed conditions

The closure notifications (References 1, 2, and 3) summarize the methodology for item 1 from VEGP Unit 3 COL Appendix C ITAAC table 3.5-6, conducting the inspections, tests, or analyses (ITA), and the results that demonstrate that the acceptance criteria are met. These closure notifications are submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination basis are referenced in the closure notifications for items 1.i, 1.ii, and 1.iii of VEGP Unit 3 COL Appendix C Table 3.5-6, and are available for NRC inspection as part of the ITAAC Completion Package (Reference 4).

### **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

### **References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.5.00.01.i [Index No. 823]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.5.00.01.ii [Index No. 824]
3. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.5.00.01.iii [Index No. 825]
4. ITAAC 3.6.00.01.ii Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 3.6.00.01.iii [Index No. 836]**

**ITAAC Statement**

**Design Commitment**

1. *The diverse leak detection methods provide the nonsafety-related function of detecting small leaks when RCS leakage indicates possible reactor coolant pressure boundary degradation.*

**Inspections/Tests/Analyses**

*See sections:*

- iii) *See ITAAC Table 2.1.2-4, Items 5.a), 7.a), and 10 for the pressurizer level measuring instruments RCS-195A, RCS-195B, RCS-195C, and RCS-195D.*

**Acceptance Criteria**

*See sections:*

- iii) *See ITAAC Table 2.1.2-4, Items 5.a), 7.a), and 10 for the pressurizer level measuring instruments RCS-195A, RCS-195B, RCS-195C, and RCS-195D.*

**ITAAC Completion Description**

Multiple ITAAC are performed to demonstrate diverse leak detection methods provide the nonsafety-related function of detecting small leaks when Reactor Coolant System (RCS) leakage indicates possible reactor coolant pressure boundary degradation. This ITAAC is met by reference to ITAAC items 5a.i, 5a.ii, 5a.iii, 7a.i, 7a.ii, and 10 in VEGP Unit 3 Combined License (COL) Appendix C Table 2.1.2-4. Item 5a.i verifies that Seismic Category I equipment identified in VEGP Unit 3 COL Appendix C Table 2.1.2-1 is located on the Nuclear Island. Item 5a.ii verifies that a report exists and concludes that the seismic Category I equipment can withstand seismic design basis loads without loss of safety function. Item 5a.iii verifies that a report exists and concludes that the as-built equipment including anchorage is seismically bounded by the tested or analyzed conditions. Item 7a.i verifies that a report exists and concludes that the Class 1E equipment identified in VEGP Unit 3 COL Appendix C Table 2.1.2-1 as being qualified for a harsh environment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of safety function for the time required to perform the safety function. Item 7a.ii verifies that a report exists and concludes that the as-built Class 1E equipment and the associated wiring, cables, and terminations identified in VEGP Unit 3 COL Appendix C Table 2.1.2-1 as being qualified for a harsh environment are bounded by type tests, analyses, or a combination of type tests and analyses. Item 10 verifies that safety-related displays identified in VEGP Unit 3 COL Appendix C Table 2.1.2-1 can be retrieved in the Main Control Room.

The closure notifications (References 1, 2, 3, 4, 5, and 6) for the referenced ITAAC summarize the methodology for conducting the inspections, tests, or analyses and the results that demonstrate that the acceptance criteria are met. These closure notifications are submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination bases are referenced in the closure notifications for items 5a.i, 5a.ii, 5a.iii, 7a.i, 7a.ii, and 10 from VEGP Unit 3 COL Appendix C ITAAC Table 2.1.2-4 and are available for NRC inspection as part of the ITAAC Completion Package (Reference 7).

### **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

### **References (available for NRC inspection)**

1. ND-XX-XXXX, ITAAC Closure Notification on Completion of ITAAC 2.1.02.05a.i [Index No. 19]
2. ND-XX-XXXX, ITAAC Closure Notification on Completion of ITAAC 2.1.02.05a.ii [Index No. 20]
3. ND-XX-XXXX, ITAAC Closure Notification on Completion of ITAAC 2.1.02.05a.iii [Index No. 21]
4. ND-XX-XXXX, ITAAC Closure Notification on Completion of ITAAC 2.1.02.07a.i [Index No. 24]
5. ND-XX-XXXX, ITAAC Closure Notification on Completion of ITAAC 2.1.02.07a.ii [Index No. 25]
6. ND-XX-XXXX, ITAAC Closure Notification on Completion of ITAAC 2.1.02.10 [Index No. 45]
7. ITAAC 3.6.00.01.iii Completion Package
8. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"



**Subject: Uncompleted ITAAC 3.6.00.01.iv [Index No. 837]**

**ITAAC Statement**

**Design Commitment**

2. *The diverse leak detection methods provide the nonsafety-related function of detecting small leaks when RCS leakage indicates possible reactor coolant pressure boundary degradation.*

**Inspections/Tests/Analyses**

*See sections:*

- iv) *See ITAAC Table 2.1.2-4, Items 5.a) and 7.a) for the RCS hot and cold leg temperature instruments RCS-121A, RCS-121B, RCS-121C, RCS-121D, RCS-122A, RCS-122B, RCS-122C, RCS-122D, RCS-131A, RCS-131B, RCS-131C, RCS-131D, RCS-132A, RCS-132B, RCS-132C, and RCS-132D.*

**Acceptance Criteria**

*See sections:*

- iv) *See ITAAC Table 2.1.2-4, Items 5.a) and 7.a) for the RCS hot and cold leg temperature instruments RCS-121A, RCS-121B, RCS-121C, RCS-121D, RCS-122A, RCS-122B, RCS-122C, RCS-122D, RCS-131A, RCS-131B, RCS-131C, RCS-131D, RCS-132A, RCS-132B, RCS-132C, and RCS-132D.*

**ITAAC Completion Description**

Multiple ITAAC are performed to demonstrate diverse leak detection methods provide the nonsafety-related function of detecting small leaks when Reactor Coolant System (RCS) leakage indicates possible reactor coolant pressure boundary degradation. This ITAAC is met by reference to ITAAC items 5a.i, 5a.ii, 5a.iii, 7a.i, and 7a.ii in VEGP Unit 3 Combined License (COL) Appendix C Table 2.1.2-4. The reference is to 5a.i, 5a.ii, 5a.iii, 7a.i, and 7a.ii in VEGP Unit 3 COL Appendix C Table 2.1.2-4, where item 5a.i verifies that Seismic Category I equipment identified in VEGP Unit 3 COL Appendix C Table 2.1.2-1 is located on the Nuclear Island. Item 5a.ii verifies that a report exists and concludes that the seismic Category I equipment can withstand seismic design basis loads without loss of safety function. Item 5a.iii verifies that a report exists and concludes that the as-built equipment including anchorage is seismically bounded by the tested or analyzed conditions. Item 7a.i verifies that a report exists and concludes that the Class 1E equipment identified in VEGP Unit 3 COL Appendix C Table 2.1.2-1 as being qualified for a harsh environment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of safety function for the time required to perform the safety function. Item 7a.ii verifies that a report exists and concludes that the as-built Class 1E equipment and the associated wiring, cables, and terminations identified in VEGP Unit 3 COL Appendix C Table 2.1.2-1 as being qualified for a harsh environment are bounded by type tests, analyses, or a combination of type tests and analyses.

The closure notifications (References 1, 2, 3, 4, and 5) for the referenced ITAAC summarize the methodology for conducting the inspections, tests, or analyses and the results that demonstrate that the acceptance criteria are met. These closure notifications are submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination bases are referenced in the closure notifications for items 5a.i, 5a.ii, 5a.iii, 7a.i, and 7a.ii from VEGP Unit 3 COL Appendix C ITAAC Table 2.1.2-4 and are available for NRC inspection as part of the ITAAC Completion Package (Reference 6).

### **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

### **References (available for NRC inspection)**

1. ND-XX-XXXX, ITAAC Closure Notification on Completion of ITAAC 2.1.02.05a.i [Index No. 19]
2. ND-XX-XXXX, ITAAC Closure Notification on Completion of ITAAC 2.1.02.05a.ii [Index No. 20]
3. ND-XX-XXXX, ITAAC Closure Notification on Completion of ITAAC 2.1.02.05a.iii [Index No. 21]
4. ND-XX-XXXX, ITAAC Closure Notification on Completion of ITAAC 2.1.02.07a.i [Index No. 24]
5. ND-XX-XXXX, ITAAC Closure Notification on Completion of ITAAC 2.1.02.07a.ii [Index No. 25]
6. ITAAC 3.6.00.01.iv Completion Package
7. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 3.6.00.01.v [Index No. 838]**

**ITAAC Statement**

**Design Commitment**

3. *The diverse leak detection methods provide the nonsafety-related function of detecting small leaks when RCS leakage indicates possible reactor coolant pressure boundary degradation.*

**Inspections/Tests/Analyses**

*See sections:*

- v) *See ITAAC Table 2.1.2-4, Items 5.a), 7.a), and 10 for the RCS pressure instruments RCS-140A, RCS-140B, RCS-140C, and RCS-140D.*

**Acceptance Criteria**

*See sections:*

- v) *See ITAAC Table 2.1.2-4, Items 5.a), 7.a), and 10 for the RCS pressure instruments RCS-140A, RCS-140B, RCS-140C, and RCS-140D.*

**ITAAC Completion Description**

Multiple ITAAC are performed to demonstrate diverse leak detection methods provide the nonsafety-related function of detecting small leaks when Reactor Coolant System (RCS) leakage indicates possible reactor coolant pressure boundary degradation. This ITAAC is met by reference to ITAAC items 5a.i, 5a.ii, 5a.iii, 7a.i, 7a.ii, and 10 in VEGP Unit 3 Combined License (COL) Appendix C Table 2.1.2-4. The reference is to 5a.i, 5a.ii, 5a.iii, 7a.i, 7a.ii, and 10 in VEGP Unit 3 COL Appendix C Table 2.1.2-4, where item 5a.i verifies that Seismic Category I equipment identified in VEGP Unit 3 COL Appendix C Table 2.1.2-1 is located on the Nuclear Island. Item 5a.ii verifies that a report that exists and concludes that the seismic Category I equipment can withstand seismic design basis loads without loss of safety function. Item 5a.iii verifies that a report that exists and concludes that the as-built equipment including anchorage is seismically bounded by the tested or analyzed conditions. Item 7a.i verifies that a report that exists and concludes that the Class 1E equipment identified in VEGP Unit 3 COL Appendix C Table 2.1.2-1 as being qualified for a harsh environment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of safety function for the time required to perform the safety function. Item 7a.ii verifies that a report that exists and concludes that the as-built Class 1E equipment and the associated wiring, cables, and terminations identified in VEGP Unit 3 COL Appendix C Table 2.1.2-1 as being qualified for a harsh environment are bounded by type tests, analyses, or a combination of type tests and analyses. Item 10 verifies that safety-related displays identified in VEGP Unit 3 COL Appendix C Table 2.1.2-1 can be retrieved in the Main Control Room.

The closure notifications (References 1, 2, 3, 4, 5, and 6) for the referenced ITAAC summarize the methodology for conducting the inspections, tests, or analyses and the results that

demonstrate that the acceptance criteria are met. These closure notifications are submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination bases are referenced in the closure notifications for items 5a.i, 5a.ii, 5a.iii, 7a.i, 7a.ii, and 10 from VEGP Unit 3 COL Appendix C ITAAC Table 2.1.2-4 and are available for NRC inspection as part of the ITAAC Completion Package (Reference 7).

### **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

### **References (available for NRC inspection)**

1. ND-XX-XXXX, ITAAC Closure Notification on Completion of ITAAC 2.1.02.05a.i [Index No. 19]
2. ND-XX-XXXX, ITAAC Closure Notification on Completion of ITAAC 2.1.02.05a.ii [Index No. 20]
3. ND-XX-XXXX, ITAAC Closure Notification on Completion of ITAAC 2.1.02.05a.iii [Index No. 21]
4. ND-XX-XXXX, ITAAC Closure Notification on Completion of ITAAC 2.1.02.07a.i [Index No. 24]
5. ND-XX-XXXX, ITAAC Closure Notification on Completion of ITAAC 2.1.02.07a.ii [Index No. 25]
6. ND-XX-XXXX, ITAAC Closure Notification on Completion of ITAAC 2.1.02.10 [Index No. 45]
7. ITAAC 3.6.00.01.v Completion Package
8. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 3.6.00.01.vi [Index No. 839]**

### **ITAAC Statement**

#### **Design Commitment**

1. *The diverse leak detection methods provide the nonsafety-related function of detecting small leaks when RCS leakage indicates possible reactor coolant pressure boundary degradation.*

#### **Inspections/Tests/Analyses**

*See sections:*

- vi) *See ITAAC Table 2.3.2-4, Item 13 for the letdown and makeup flow instruments CVS-001 and CVS-025.*

#### **Acceptance Criteria**

*See sections:*

- vi) *See ITAAC Table 2.3.2-4, Item 13 for the letdown and makeup flow instruments CVS-001 and CVS-025.*

### **ITAAC Completion Description**

Multiple ITAAC are performed to demonstrate diverse leak detection methods provide the nonsafety-related function of detecting small leaks when Reactor Coolant System (RCS) leakage indicates possible reactor coolant pressure boundary degradation. This ITAAC Design Commitment is met by reference to ITAAC item 13 in VEGP Unit 3 Combined License (COL) Appendix C Table 2.3.2-4. Item 13 requires an inspection for retrievability of the displays identified in VEGP Unit 3 COL Appendix C Table 2.3.2-3 in the Main Control Room.

The closure notification (Reference 1) for Item 13 in VEGP Unit 3 COL Appendix C Table 2.3.2-4 summarizes the methodology for conducting the inspections, tests, or analyses (ITA) and the results that demonstrate that the acceptance criteria are satisfied. This closure notification is submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination basis are referenced in the closure notification for Item 13 of VEGP Unit 3 COL Appendix C Table 2.3.2-4 and are available for NRC inspection as part of the ITAAC Completion Package (Reference 2).

### **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and

associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.3.02.13 [Index No.316]
2. ITAAC 3.6.00.01.vi Completion Package
3. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC 3.6.00.01.vii [Index No. 840]**

**ITAAC Statement**

**Design Commitment**

1. *The diverse leak detection methods provide the nonsafety-related function of detecting small leaks when RCS leakage indicates possible reactor coolant pressure boundary degradation.*

**Inspections/Tests/Analyses**

- vii) *See ITAAC Table 2.3.10-4, Item 10 for the reactor coolant drain tank level instrument WLS-002.*

**Acceptance Criteria**

- vii) *See ITAAC Table 2.3.10-4, Item 10 for the reactor coolant drain tank level instrument WLS-002.*

**ITAAC Completion Description**

Multiple ITAAC are performed to demonstrate diverse leak detection methods provide the nonsafety-related function of detecting small leaks when Reactor Coolant System (RCS) leakage indicates possible reactor coolant pressure boundary degradation. This ITAAC Design Commitment is met by reference to ITAAC item 10 in VEGP Unit 3 Combined License (COL) Appendix C. Item 10 requires an inspection for retrievability of the displays identified in VEGP Unit 3 COL Appendix C Table 2.3.10-3 in the Main Control Room.

The closure notification for Item 10 in VEGP Unit 3 COL Appendix C Table 2.3.10-4 (Reference 1) summarizes the methodology for conducting the inspections, tests, or analyses (ITA) and the results that demonstrate that the acceptance criteria are satisfied. This closure notification is submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination basis are referenced in the closure notification for Item 10 of VEGP Unit 3 COL Appendix C Table 2.3.10-4 and are available for NRC inspection as part of the ITAAC Completion Package (Reference 2).

**List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

**References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.3.10.10 [Index No. 448]
2. ITAAC 3.6.00.01.vii Completion Package
3. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"



**Subject: Uncompleted ITAAC E.3.9.06.00.04 [Index No. 862]**

**ITAAC Statement**

**Program Commitment**

6.4 *The means exists to acquire and evaluate meteorological information. [I.5]*

**Inspections/Tests/Analyses**

6.4 *A test will be performed to verify the ability to access meteorological information in the TSC and control room.*

**Acceptance Criteria**

6.4 *The following parameters are displayed in the TSC and control room:*

- *Wind speed (at 10 and 60 meters)*
- *Wind direction (at 10 and 60 meters)*
- *Standard deviation of horizontal wind direction (at 10 meters)*
- *Vertical temperature difference (between 10 and 60 meters)*
- *Ambient temperature (at 10 meters)*
- *Dew-point temperature (at 10 meters)*
- *Precipitation (at the tower base)*

**ITAAC Completion Description**

A test is performed to demonstrate the means exists to acquire and evaluate meteorological information by verifying the ability to access meteorological information in the Technical Support Center (TSC) and control room.

The test is performed using procedure ND-XX-XX-XXX, Meteorological Information Verification, (Reference 1) and verifies the following parameters are displayed in the TSC and control room:

- Wind speed (at 10 and 60 meters)
- Wind direction (at 10 and 60 meters)
- Standard deviation of horizontal wind direction (at 10 meters)
- Vertical temperature difference (between 10 and 60 meters)
- Ambient temperature (at 10 meters)
- Dew-point temperature (at 10 meters)

- Precipitation (at the tower base)

The results of the test are documented in ND-XX-XX-XXX-F01, Unit 3 Meteorological Information Verification Test Report (Reference 2), and conclude that the following parameters are displayed in the TSC and control room:

- Wind speed (at 10 and 60 meters)
- Wind direction (at 10 and 60 meters)
- Standard deviation of horizontal wind direction (at 10 meters)
- Vertical temperature difference (between 10 and 60 meters)
- Ambient temperature (at 10 meters)
- Dew-point temperature (at 10 meters)
- Precipitation (at the tower base)

The Unit 3 Meteorological Information Verification Test Report is available for NRC inspection as part of the ITAAC Completion Package (Reference 3).

### **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

### **References (available for NRC inspection)**

1. ND-XX-XX-XXX, Meteorological Information Verification
2. ND-XX-XX-XXX-F01, Unit 3 Meteorological Information Verification Test Report
3. ITAAC E.3.9.06.00.04 Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC E.3.9.07.01.01 [Index No. 865]**

**ITAAC Statement**

**Program Commitment**

7.1 *The means exists to warn and advise onsite individuals of an emergency, including those in areas controlled by the operator, including:*

- *Employees not having emergency assignments*
- *Visitors*
- *Contractor and construction personnel*
- *Other persons who may be in the public access areas, on or passing through the site, or within the owner controlled area*

*[J.1]*

**Inspections/Tests/Analyses**

7.1 *A test of the onsite warning and communication capability emergency implementing procedures (EIPs) including protective action guidelines, assembly and accountability, and site dismissal will be performed during a drill.*

**Acceptance Criteria**

7.1.1 *Demonstrate the capability to direct and control emergency operations.*

**ITAAC Completion Description**

Multiple ITAAC are performed to verify that a means exists to warn and advise the onsite individuals identified in VEGP Unit 3 Combined License (COL) Appendix C Table E.3.9-7, Index No. 865, of an emergency. The subject ITAAC requires that a test of the onsite warning and communication capability Emergency Implementing Procedures (EIPs) including protective action guidelines, assembly and accountability, and site dismissal is performed during a drill to demonstrate the capability to direct and control emergency operations.

The test, in the form of an emergency plan drill, is developed in accordance with NMP-EP-303, Drill and Exercise Standards (Reference 1). The emergency plan drill scenario is of sufficient severity to demonstrate the capability to direct and control emergency operations by testing onsite warning and communication capability EIPs including protective action guidelines, assembly and accountability, and site dismissal performance during the drill.

NMP-EP-303-F01, Drill/Exercise Critique, (Reference 2) is used to critique the emergency plan drill. The Drill/Exercise Critique concludes that the capability to direct and control emergency operations is satisfactory by testing the onsite warning and communication capability EIPs including protective action guidelines, assembly and accountability, and site dismissal performance during a drill.

The NMP-EP-303-F01, Drill/Exercise Critique, is available for NRC inspection as part of the ITAAC Completion Package (Reference 3).

### **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

### **References (available for NRC inspection)**

1. NMP-EP-303, Drill and Exercise Standards
2. NMP-EP-303-F01, Drill/Exercise Critique
3. ITAAC E.3.9.07.01.01 Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC E.3.9.07.01.02 [Index No. 866]**

**ITAAC Statement**

**Program Commitment**

- 7.1 *The means exists to warn and advise onsite individuals of an emergency, including those in areas controlled by the operator, including:*
- *Employees not having emergency assignments*
  - *Visitors*
  - *Contractor and construction personnel*
  - *Other persons who may be in the public access areas, on or passing through the site, or within the owner controlled area*

*[J.1]*

**Inspections/Tests/Analyses**

- 7.1 *A test of the onsite warning and communication capability emergency implementing procedures (EIPs) including protective action guidelines, assembly and accountability, and site dismissal will be performed during a drill.*

**Acceptance Criteria**

- 7.1.2 *Demonstrate the ability to notify and advise onsite personnel including:*
1. *Non-essential personnel;*
  2. *Visitors;*
  3. *Contractor and construction personnel;*
- and*
4. *Other personnel within the owner controlled area.*

**ITAAC Completion Description**

Multiple ITAAC are performed to verify that a means exists to warn and advise the onsite individuals identified in VEGP Unit 3 Combined License (COL) Appendix C Table E.3.9-7, Index No. 866, of an emergency. The subject ITAAC requires that a test of the onsite warning and communication capability Emergency Implementing Procedures (EIPs) including protective action guidelines, assembly and accountability, and site dismissal is performed during a drill to demonstrate the ability to notify and advise onsite personnel including: non-essential personnel, visitors, contractor and construction personnel, and other personnel within the owner controlled area.

The test, in the form of an emergency plan drill, is developed in accordance with NMP-EP-303, Drill and Exercise Standards, (Reference 1). The emergency plan drill scenario is of sufficient severity to demonstrate the ability to notify and advise onsite personnel of an emergency by testing onsite warning and communication capability EIPs including protective action guidelines, assembly and accountability, and site dismissal performance during the drill.

NMP-EP-303-F01, Drill/Exercise Critique, (Reference 2) is used to critique the emergency plan drill. The Drill/Exercise Critique concludes that the ability to notify and advise onsite personnel including non-essential personnel, visitors, contractor and construction personnel, and other personnel within the owner controlled area is satisfactory, by testing the onsite warning and communication capability EIPs including protective action guidelines, assembly and accountability, and site dismissal performance during a drill.

The NMP-EP-303-F01, Drill/Exercise Critique, is available for NRC inspection as part of the ITAAC Completion Package (Reference 3).

### **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

### **References (available for NRC inspection)**

1. NMP-EP-303, Drill and Exercise Standards
2. NMP-EP-303-F01, Drill/Exercise Critique
3. ITAAC E.3.9.07.01.02 Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC E.3.9.07.01.03 [Index No. 867]**

### **ITAAC Statement**

#### **Program Commitment**

- 7.1 *The means exists to warn and advise onsite individuals of an emergency, including those in areas controlled by the operator, including:*
- *Employees not having emergency assignments*
  - *Visitors*
  - *Contractor and construction personnel*
  - *Other persons who may be in the public access areas, on or passing through the site, or within the owner controlled area*

*[J.1]*

#### **Inspections/Tests/Analyses**

- 7.1 *A test of the onsite warning and communication capability emergency implementing procedures (EIPs) including protective action guidelines, assembly and accountability, and site dismissal will be performed during a drill.*

#### **Acceptance Criteria**

- 7.1.3 *Demonstrate the ability to prepare for around-the-clock staffing requirements.*

### **ITAAC Completion Description**

Multiple ITAAC are performed to verify that a means exists to warn and advise the onsite individuals identified in VEGP Unit 3 Combined License (COL) Appendix C Table E.3.9-7, Index No. 867, of an emergency. The subject ITAAC requires that a test of the onsite warning and communication capability Emergency Implementing Procedures (EIPs) including protective action guidelines, assembly and accountability, and site dismissal is performed during a drill to demonstrate the ability to prepare for around-the-clock staffing requirements.

The test, in the form of an emergency plan drill, is developed in accordance with NMP-EP-303, Drill and Exercise Standards, (Reference 1). The emergency plan drill scenario is of sufficient severity to demonstrate the ability to prepare for around-the-clock staffing requirements by testing onsite warning and communication capability EIPs including protective action guidelines, assembly and accountability, and site dismissal performance during the drill.

NMP-EP-303-F01, Drill/Exercise Critique, (Reference 2) is used to critique the emergency plan drill. The Drill/Exercise Critique concludes that the ability to prepare for around-the-clock staffing requirements is satisfactory by testing the onsite warning and communication capability EIPs including protective action guidelines, assembly and accountability, and site dismissal performance during a drill.

The NMP-EP-303-F01, Drill/Exercise Critique, is available for NRC inspection as part of the ITAAC Completion Package (Reference 3).

### **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

### **References (available for NRC inspection)**

1. NMP-EP-303, Drill and Exercise Standards
2. NMP-EP-303-F01, Drill/Exercise Critique
3. ITAAC E.3.9.07.01.03 Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"



**Subject: Uncompleted ITAAC E.3.9.07.01.04 [Index No. 868]**

## **ITAAC Statement**

### **Program Commitment**

- 7.1 *The means exists to warn and advise onsite individuals of an emergency, including those in areas controlled by the operator, including:*
- *Employees not having emergency assignments*
  - *Visitors*
  - *Contractor and construction personnel*
  - *Other persons who may be in the public access areas, on or passing through the site, or within the owner controlled area*

*[J.1]*

### **Inspections/Tests/Analyses**

- 7.1 *A test of the onsite warning and communication capability emergency implementing procedures (EIPs) including protective action guidelines, assembly and accountability, and site dismissal will be performed during a drill.*

### **Acceptance Criteria**

- 7.1.4 *Demonstrate the ability to perform assembly and accountability for all onsite individuals within 30 minutes of an emergency requiring protected area assembly and accountability.*

## **ITAAC Completion Description**

Multiple ITAAC are performed to verify that a means exists to warn and advise the onsite individuals identified in VEGP Unit 3 Combined License (COL) Appendix C Table E.3.9-7, Index No. 868, of an emergency. The subject ITAAC requires that a test of the onsite warning and communication capability Emergency Implementing Procedures (EIPs) including protective action guidelines, assembly and accountability, and site dismissal is performed during a drill to demonstrate the ability to perform assembly and accountability for all onsite individuals within 30 minutes of an emergency requiring protected area assembly and accountability.

The test, in the form of an emergency plan drill, is developed in accordance with NMP-EP-303, Drill and Exercise Standards, (Reference 1). The emergency plan drill scenario is of sufficient severity to demonstrate the ability to perform assembly and accountability for all onsite individuals within 30 minutes of an emergency requiring protected area assembly and accountability by testing onsite warning and communication capability EIPs including protective action guidelines, assembly and accountability, and site dismissal performance during the drill.

NMP-EP-303-F01, Drill/Exercise Critique, (Reference 2) is used to critique the emergency plan drill. The Drill/Exercise Critique concludes that the ability to perform assembly and

accountability for all onsite individuals within 30 minutes of an emergency requiring protected area assembly and accountability is satisfactory by testing the onsite warning and communication capability EIPs including protective action guidelines, assembly and accountability, and site dismissal performance during a drill.

The NMP-EP-303-F01, Drill/Exercise Critique, is available for NRC inspection as part of the ITAAC Completion Package (Reference 3).

### **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

### **References (available for NRC inspection)**

1. NMP-EP-303, Drill and Exercise Standards
2. NMP-EP-303-F01, Drill/Exercise Critique
3. ITAAC E.3.9.07.01.04 Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC E.3.9.07.01.05 [Index No. 869]**

## **ITAAC Statement**

### **Program Commitment**

- 7.1 *The means exists to warn and advise onsite individuals of an emergency, including those in areas controlled by the operator, including:*
- *Employees not having emergency assignments*
  - *Visitors*
  - *Contractor and construction personnel*
  - *Other persons who may be in the public access areas, on or passing through the site, or within the owner controlled area*

*[J.1]*

### **Inspections/Tests/Analyses**

- 7.1 *A test of the onsite warning and communication capability emergency implementing procedures (EIPs) including protective action guidelines, assembly and accountability, and site dismissal will be performed during a drill.*

### **Acceptance Criteria**

- 7.1.5 *Demonstrate the ability to perform site dismissal.*

## **ITAAC Completion Description**

Multiple ITAAC are performed to verify that a means exists to warn and advise the onsite individuals identified in VEGP Unit 3 Combined License (COL) Appendix C Table E.3.9-7, Index No. 869, of an emergency. The subject ITAAC requires that a test of the onsite warning and communication capability Emergency Implementing Procedures (EIPs) including protective action guidelines, assembly and accountability, and site dismissal is performed during a drill to demonstrate the ability to perform site dismissal.

The test, in the form of an emergency plan drill, is developed in accordance with NMP-EP-303, Drill and Exercise Standards, (Reference 1). The emergency plan drill scenario is of sufficient severity to demonstrate the ability to perform site dismissal by testing onsite warning and communication capability EIPs including protective action guidelines, assembly and accountability, and site dismissal performance during the drill.

NMP-EP-303-F01, Drill/Exercise Critique, (Reference 2) is used to critique the emergency plan drill. The Drill/Exercise Critique concludes that the ability to perform site dismissal is satisfactory by testing the onsite warning and communication capability EIPs including protective action guidelines, assembly and accountability, and site dismissal performance during a drill.

The NMP-EP-303-F01, Drill/Exercise Critique, is available for NRC inspection as part of the ITAAC Completion Package (Reference 3).

### **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

### **References (available for NRC inspection)**

1. NMP-EP-303, Drill and Exercise Standards
2. NMP-EP-303-F01, Drill/Exercise Critique
3. ITAAC E.3.9.07.01.05 Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Subject: Uncompleted ITAAC E.3.9.08.01.03 [Index No. 872]**

## **ITAAC Statement**

### **Program Commitment**

- 8.1 *The licensee conducts a full participation exercise to evaluate major portions of emergency response capabilities, which includes participation by each State and local agency within the plume exposure EPZ, and each State within the ingestion pathway EPZ. [N.1]*

### **Inspections/Tests/Analyses**

- 8.1 *A full participation exercise (test) will be conducted within the specified time periods of 10 CFR Part 50, Appendix E.*

### **Acceptance Criteria**

- 8.1.3 *The exercise is completed within the specified time periods of Appendix E to 10 CFR Part 50, offsite exercise objectives have been met, and there are either no uncorrected offsite deficiencies, or a license condition requires offsite deficiencies to be corrected prior to operation above 5% of rated power.*

## **ITAAC Completion Description**

Multiple ITAAC are performed to verify that VEGP Unit 3 conducts a full participation exercise to evaluate major portions of emergency response capabilities, which includes participation by each State and local agency within the plume exposure Emergency Planning Zone (EPZ), and each State within the ingestion pathway EPZ. The subject ITAAC requires that a full participation exercise (test) will be conducted within the specified time periods of 10 CFR Part 50, Appendix E to ensure offsite exercise objectives have been met, and there are either no uncorrected offsite deficiencies, or a license condition requires offsite deficiencies to be corrected prior to operation above 5% of rated power.

The test, in the form of a full participation exercise, is developed in accordance with NMP-EP-303, Drill and Exercise Standards, (Reference 1). The exercise scenario is of sufficient severity to ensure offsite exercise objectives are met, and there are either no uncorrected offsite deficiencies, or a license condition requires offsite deficiencies to be corrected prior to operation above 5% of rated power.

NMP-EP-303-F01, Drill/Exercise Critique, (Reference 2) is used to critique the full participation exercise held within the specified time periods of Appendix E to 10 CFR Part 50. The Drill/Exercise Critique concludes that offsite exercise objectives have been met, and that there are either no uncorrected offsite deficiencies, or that a license condition requires offsite deficiencies to be corrected prior to operation above 5% of rated power.

The NMP-EP-303-F01, Drill/Exercise Critique, is available for NRC inspection as part of the ITAAC Completion Package (Reference 3).

### **List of ITAAC Findings**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with this ITAAC.

### **References (available for NRC inspection)**

1. NMP-EP-303, Drill and Exercise Standards
2. NMP-EP-303-F01, Drill/Exercise Critique
3. ITAAC E.3.9.08.01.03 Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"