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10 CFR 52.99(c)(1)

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3
ITAAC Closure Notification on
Completion of ITAAC 2.2.03.08c.vi.01 [Index Number 189]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 3 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.03.08c.vi.01 [Index Number 189] for verifying the calculated volume of the Core Makeup Tanks (CMTs) is greater than or equal to 2487 ft³. The closure process for this ITAAC is based on 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.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact David Woods at 706-848-6903.

Respectfully submitted,

Michael J. Yox
Regulatory Affairs Director Vogtle 3&4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC 2.2.03.08c.vi.01 [Index Number 189]

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Southern Nuclear Operating Company
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Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC 2.2.03.08c.vi.01 [Index Number 189]

ITAAC Statement

Design Commitment:

8.c) The PXS provides RCS makeup, boration, and safety injection during design basis events.

Inspections, Tests, Analyses:

vi) Inspections of each of the following tanks will be conducted:

1. CMTs

Acceptance Criteria:

vi) The calculated volume of each of the following tanks is as follows:

1. CMTs $\geq 2487 \text{ ft}^3$

ITAAC Determination Basis

Multiple Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) are performed to ensure the Passive Core Cooling System (PXS) provides Reactor Coolant System (RCS) makeup, boration, and safety injection during design basis events. This ITAAC requires an inspection of the Core Makeup Tanks (CMTs) to confirm that the CMT volume is greater than or equal to 2487 ft^3 . Measurements and calculations of the CMTs were conducted to verify that the calculated volume of each CMT is greater than or equal to 2487 ft^3 .

Measurements were performed on site using a laser scanner to determine that each tank's volume is greater than or equal to 2487 ft^3 . Two scanner locations were used within each tank to provide complete scanning coverage of the internal surface of the CMTs. One complete data file consisting of the composite of the scans, and representative of the entire internal surface of the CMT was analyzed. Features not representative of the final tank configuration such as control point targets, cables, tripod and other features that are not part of the final operating tank condition were removed from the data file. Once the data represented a closed geometric shape, the volume was calculated from the model.

The volume of the Unit 3 CMT A (Component 1, Part 4595, Tag No. PXS-MT-02A) is 2501.94 ft^3 , and the Unit 3 CMT B (Component 2, Part 4596, Tag No. PXS-MT-02B) is 2494.83 ft^3 . The diffuser, which is part of the final tank configuration, has a negligible impact on the total volume of either tank. This is documented in the AP1000 Vogtle Unit 3 Core Makeup Tanks Volumetric Scanning Report (Reference 1).

The calculated volume for each Vogtle Unit 3 CMT is greater than or equal to 2487 ft^3 and meets the ITAAC 2.2.03.08c.vi.01 acceptance criteria.

ITAAC Finding Review

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

associated corrective actions. This review found that there are no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review document number is included in the Vogtle Unit 3 ITAAC Completion Package for ITAAC 2.2.03.08c.vi.01 (Reference 2) and available for NRC inspection.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.2.03.08c.vi.01 was performed for Vogtle Unit 3 and that the prescribed acceptance criteria are met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. SV3-MT01-VDR-001, Revision 1, AP1000 Vogtle Unit 3 Core Makeup Tanks Volumetric Scanning Report
2. SVP_SV0_003904, Attachment 1, Submittal of Inspections, Test, Analyses and Acceptance Criteria (ITAAC) Completion Package for Unit 3 ITAAC 2.2.03.08c.vi.01 (COL Index Number 189) (PXS Core Makeup Tank Volume)