

M. J. Yox  
Regulatory Affairs Director  
Vogtle 3&4  
Nuclear Development

Southern Nuclear  
Operating Company, Inc.  
7825 River Road  
Waynesboro, GA 30830

Tel 706.848.6459



Docket No.: 52-025

**SEP 29 2016**

ND-16-1847  
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  
Item 2.2.03.08c.v.02 [Index Number 188]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of September 30, 2016, Vogtle Electric Generating Plant (VEGP) Unit 3 Uncompleted Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) Item 2.2.03.08c.v.02 [Index Number 188] has not been completed greater than 225-days prior to initial fuel load. Enclosure 1 describes the plan for completing ITAAC 2.2.03.08c.v.02 [Index Number 188]. 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 706-848-6903.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Michael J. Yox".

Michael J. Yox  
Regulatory Affairs Director Vogtle 3&4

MJY/KMS/amm

U.S. Nuclear Regulatory Commission

ND-16-1847

Page 2 of 4

**Enclosure:**

1. Vogtle Electric Generating Plant (VEGP) Unit 3 Completion Plan for Uncompleted ITAAC  
Item 2.2.03.08c.v.02 [Index Number 188]

**To:**

**Southern Nuclear Operating Company/Georgia Power Company**

Mr. S. E. Kuczynski (w/o enclosures)

Mr. D. A. Bost (w/o enclosures)

Mr. M. D. Meier

Mr. M. D. Rauckhorst (w/o enclosures)

Mr. D. H. Jones (w/o enclosures)

Ms. K. D. Fili

Mr. D. L. McKinney

Mr. B. H. Whitley

Mr. D. L. Fulton

Mr. C. E. Morrow

Mr. M. J. Yox

Mr. D. Woods

Ms. A. L. Pugh

Ms. K. M. Stacy

Mr. A. S. Parton

Mr. W. A. Sparkman

Mr. J. P. Redd

Mr. D. R. Culver

Mr. F. H. Willis

Document Services RTYPE: VND.LI.L06

File AR.01.02.06

**cc:**

**Nuclear Regulatory Commission**

Ms. C. Haney (w/o enclosures)

Ms. A. Bradford (w/o enclosures)

Ms. J. L. Dixon-Herrity (w/o enclosures)

Ms. J. M. Heisserer

Mr. C. J. Even

Mr. C. P. Patel

Mr. B. M. Bovol

Ms. R. C. Reyes

Ms. M. A. Sutton

Mr. M. E. Ernstes

Mr. G. J. Khouri

Mr. M. G. Kowal

Mr. J. D. Fuller

Mr. T. E. Chandler

Ms. S. E. Temple

Ms. P. Braxton

Mr. M. A. Junge

Mr. T. C. Brimfield

Mr. A. J. Lerch

**Oglethorpe Power Corporation**

Mr. M. W. Price  
Ms. K. T. Haynes  
Ms. A. Whaley

**Municipal Electric Authority of Georgia**

Mr. J. E. Fuller  
Mr. S. M. Jackson

**Dalton Utilities**

Mr. D. Cope

**WECTEC**

Ms. K. Stoner (w/o enclosures)  
Mr. C. A. Castell

**Westinghouse Electric Company, LLC**

Mr. R. Easterling (w/o enclosures)  
Mr. J. W. Crenshaw (w/o enclosures)  
Mr. L. Woodcock (w/o enclosures)  
Mr. C. F. Landon  
Mr. P. A. Russ  
Mr. A. F. Dohse  
Mr. M. Y. Shaqqo  
Ms. S. DiTommaso

**Other**

Mr. J. E. Hesler, *Bechtel Power Corporation*  
Ms. L. Matis, *Tetra Tech NUS, Inc.*  
Dr. W. R. Jacobs, Jr., *Ph.D., GDS Associates, Inc.*  
Mr. S. Roetger, *Georgia Public Service Commission*  
Ms. S. W. Kernizan, *Georgia Public Service Commission*  
Mr. K. C. Greene, *Troutman Sanders*  
Mr. S. Blanton, *Balch Bingham*

ND-16-1847  
Enclosure 1  
Completion Plan

**Southern Nuclear Operating Company**

**ND-16-1847**

**Enclosure 1**

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

**Completion Plan for Uncompleted ITAAC  
Item 2.2.03.08c.v.02 [Index No. 188]**

**Subject: Uncompleted ITAAC 2.2.03.08c.v.02 [Index No. 188]**

### **ITAAC Statement**

#### **Design Commitment**

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

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

v) *Inspections of the elevation of the following tanks will be conducted:*

2. IRWST

#### **Acceptance Criteria**

v) *The elevation of the bottom inside tank surface is higher than the direct vessel injection nozzle centerline by the following:*

2.  $IRWST \geq 3.4 \text{ ft}$

### **ITAAC Completion Description**

Multiple ITAAC are performed to demonstrate that the Passive Core Cooling System (PXS) provides Reactor Coolant System (RCS) makeup, boration, and safety injection during design basis events. This ITAAC requires that inspections be conducted of the In-containment Refueling Water Storage Tank (IRWST) to verify that the elevation of the bottom inside tank surface is higher than the direct vessel injection nozzle centerline by  $\geq 3.4 \text{ ft}$ .

The inspection of the bottom inside tank surface of the IRWST and the direct vessel injection nozzle centerline is performed using survey equipment in accordance with site survey and measurement procedures. The measured elevation of the bottom inside tank surface of the IRWST is compared to the measured elevation of the direct vessel injection nozzle centerline using a common reference point.

The inspection results are documented in the Principal Closure Document XXX (Reference 1) supporting the ITAAC 2.2.03.08c.v.02 Completion Package (Reference 2) and determined that the elevation of the bottom inside tank surface of the IRWST is xxx feet and the elevation of the direct vessel injection nozzle centerline is yyy feet. The inspection results verify that the elevation of the bottom inside tank surface of the IRWST is x.x ft greater than the elevation of the direct vessel injection nozzle centerline. This meets the ITAAC acceptance criteria of  $\geq 3.4 \text{ ft}$ .

Principal Closure Document XXX exists and is available for NRC inspection as part of the ITAAC 2.2.03.08c.v.02 Completion Package.

### **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. Principal Closure Document XXX
2. ITAAC 2.2.03.08c.v.02 Completion Package
3. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"