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Docket No.: 52-025

SEP 30 2016

ND-16-1863
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 2.6.03.10 [Index Number 619]

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 2.6.03.10 [Index Number 619] has not been completed greater than 225-days prior to initial fuel load. Enclosure 1 describes the plan for completing ITAAC 2.6.03.10 [Index Number 619]. 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,


Michael J. Yox
Regulatory Affairs Director Vogtle 3&4

MJY/KMS/amm

U.S. Nuclear Regulatory Commission

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Enclosure:

1. Vogtle Electric Generating Plant (VEGP) Unit 3 Completion Plan for Uncompleted ITAAC
Item 2.6.03.10 [Index Number 619]

To:

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Enclosure 1
Completion Plan

Southern Nuclear Operating Company

ND-16-1863

Enclosure 1

Vogtle Electric Generating Plant (VEGP) Unit 3

**Completion Plan for Uncompleted ITAAC
Item 2.6.03.10 [Index No. 619]**

Subject: Uncompleted ITAAC 2.6.03.10 [Index No. 619]

ITAAC Statement

Design Commitment

10. *The IDS electrical distribution system cables are rated to withstand fault currents for the time required to clear the fault from its power source.*

Inspections/Tests/Analyses

Analyses for the as-built IDS dc electrical distribution system to determine fault currents will be performed.

Acceptance Criteria

Analyses for the as-built IDS dc electrical distribution system exist and conclude that the IDS dc electrical distribution system cables will withstand the analyzed fault currents, as determined by manufacturer's ratings, for the time required to clear the fault from its power source as determined by the circuit interrupting device coordination analyses.

ITAAC Completion Description

Analyses for the as-built Class 1E dc and Uninterruptible Power Supply System (IDS) dc electrical distribution system are performed to verify that the IDS dc electrical distribution system cables will withstand the analyzed fault currents, as determined by manufacturer's ratings, for the time required to clear the fault from its power source as determined by the circuit interrupting device coordination analyses. Fault current and circuit interrupting device coordination analysis requirements for the IDS dc electrical distribution system are described in VEGP 3&4 Updated Final Safety Analysis Report, Section 8.3.2.2, "Analysis" (Reference 1).

The worst case short circuit (fault) currents of the as-built IDS electrical distribution system cables are determined by calculation and are summarized in the IDS Short Circuit Analysis (Reference 2). The results of Reference 2 are used in combination with the circuit interrupting device IDS Protection Coordination Study (Reference 3) to determine the worst case analyzed fault currents for the time required to clear the fault from its power source.

The as-built IDS dc electrical distribution system cables are inspected in accordance with QSI 10.1-V, "Inspection Planning and Reporting" (Reference 4). Each cable is inspected by Quality Control when it is removed from the specified cable reel. The manufacturer's unique cable reel number is recorded during the inspection. The cable reel number provides traceability to the manufacturer's rating of the cable. Each cable termination is inspected by Quality Control following installation. The inspection records provide traceability to the manufacturer's rating for each cable terminal.

The manufacturer's rating of the cable and cable terminals, as traceable through inspection records, are compared to the fault current information determined in References 2 and 3 to verify that the fault current capacities of as-built IDS dc electrical distribution system cables, as determined by manufacturer's ratings, exceed their analyzed fault currents for the time required to clear the fault from its power source.

The results of these comparison analyses are documented in the Principal Closure Document XXX (Reference 5) supporting the ITAAC 2.6.03.10 Completion Package (Reference 6), and conclude that the fault current capacities of as-built IDS dc electrical distribution system cables, as determined by manufacturer's ratings, exceed their analyzed fault currents for the time required to clear the fault from its power source as determined by the circuit interrupting device coordination analyses.

Principal Closure Document XXX exists and is available for NRC inspection as part of the ITAAC 2.6.03.10 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. VEGP 3&4 Updated Final Safety Analysis Report, Section 8.3.2.2, Analysis
2. IDS Short Circuit Analysis
3. IDS Protection Coordination Study
4. QSI 10.1-V, Inspection Planning and Reporting
5. Principal Closure Document XXX
6. ITAAC 2.6.03.10 Completion Package
7. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"