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Docket No.: 52-025

**SEP 30 2016**

ND-16-1877  
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 3.2.00.03.iv [Index Number 749]

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 3.2.00.03.iv [Index Number 749] has not been completed greater than 225-days prior to initial fuel load. Enclosure 1 describes the plan for completing ITAAC 3.2.00.03.iv [Index Number 749]. 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

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**Enclosure:**

1. Vogtle Electric Generating Plant (VEGP) Unit 3 Completion Plan for Uncompleted ITAAC  
Item 3.2.00.03.iv [Index Number 749]

**To:**

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File AR.01.02.06

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Ms. S. W. Kernizan, *Georgia Public Service Commission*  
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Mr. S. Blanton, *Balch Bingham*

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Enclosure 1  
Completion Plan

**Southern Nuclear Operating Company**

**ND-16-1877**

**Enclosure 1**

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

**Completion Plan for Uncompleted ITAAC  
Item 3.2.00.03.iv [Index No. 749]**

**Subject: Uncompleted ITAAC 3.2.00.03.iv [Index No. 749]**

### **ITAAC Statement**

#### **Design Commitment**

3. *The MCR provides a suitable workspace environment for use by the MCR operators.*

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

iv) *See subsection 2.6.5, Lighting System.*

#### **Acceptance Criteria**

iv) *See subsection 2.6.5, Lighting System.*

### **ITAAC Completion Description**

This ITAAC's design commitment is met by reference to ITAAC Items 1, 2.i, 2.ii, 3.i, 3.ii, 4, 5.i, 5.ii, 6.i and 6.ii in VEGP Unit 3 Combined License (COL) Appendix C, Table 2.6.5-1. Item 1 verifies that the functional arrangement of the as-built lighting system (ELS) conforms to the functional arrangement described in the Design Description of VEGP Unit 3 COL Appendix C Section 2.6.5. Item 2.i verifies that the as-built ELS has six groups of emergency lighting fixtures located in the main control room (MCR) and the ELS has four groups of panel lighting fixtures located on or near safety panels in the MCR. Item 2.ii verifies that each of the six as-built emergency lighting groups is supplied power from its respective Class 1E inverter and each of the four as-built panel lighting groups is supplied power from its respective Class 1E inverter. Item 3.i verifies that the emergency lighting fixtures located in the MCR are located on the Nuclear Island. Item 3.ii verifies that lighting supports for the lighting fixtures located in the MCR can withstand seismic design basis loads without loss of safety function.

Item 4 demonstrates that separation is provided between Class 1E division cables, and between Class 1E division cables and non-Class 1E cable in certain plant areas by reference to item 7.d in Table 3.3-6. Item 7.d in Table 3.3-6 has thirteen (13) subparts. The subparts address separation requirements for different areas of the plant. See Attachment A for the listing of referenced items (ITAAC) and the plant areas addressed in each subpart.

Item 5.i verifies that when adjusted for maximum illumination and powered by the main ac power system, the normal lighting in the MCR provides at least 50 foot candles at the safety panel and at the workstations. Item 5.ii verifies that when adjusted for maximum illumination and powered by the main ac power system, the normal lighting in the Remote Shutdown Workstation (RSW) provides at least 50 foot candles at the safety panel and at the workstations.

Item 6.i verifies that when adjusted for maximum illumination and powered by the six Class 1E inverters, the emergency lighting in the MCR provides at least 10 foot candles at the safety panel and at the workstations. Item 6.ii verifies that when adjusted for maximum illumination and powered by the six Class 1E inverters, the emergency lighting provides at least 10 foot candles at the RSW.

The ITAAC Closure Notifications (References 1 through 10) summarize the methodology for conducting the Inspections/Tests/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 1, 2.i, 2.ii, 3.i, 3.ii, 4, 5.i, 5.ii, 6.i and 6.ii from VEGP Unit 3 COL Appendix C Table 2.6.5-1. and are available for NRC inspection as part of the ITAAC Completion Package (Reference 11).

### **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 2.6.05.01 [Index No. 627]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.6.05.02.i [Index No. 628]
3. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.6.05.02.ii [Index No. 629]
4. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.6.05.03.i [Index No. 630]
5. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.6.05.03.i [Index No. 631]
6. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.6.05.04 [Index No. 632]
7. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.6.05.05.i [Index No. 633]
8. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.6.05.05.ii [Index No. 634]
9. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.6.05.06.i [Index No. 635]

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Enclosure 1  
Completion Plan

10. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.6.05.06.ii [Index No. 636]
11. ITAAC 3.2.00.03.iv Completion Package
12. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"



**Attachment A: Item 4 Reference Information**

<b>Referenced ITAAC</b>	<b>Index No.</b>	<b>Plant Area addressed</b>
3.3.00.07d.i	799	Within the main control room and remote shutdown room
3.3.00.07d.ii.a	800	Within other plant areas inside containment (limited hazard areas) (not addressed in other ITAAC)
3.3.00.07d.ii.b	801	Within other plant areas inside the non-radiologically controlled area of the auxiliary building (limited hazard areas)
3.3.00.07d.ii.c	802	Within other plant areas inside the radiologically controlled area of the auxiliary building (limited hazard areas)
3.3.00.07d.iii.a	803	Where minimum raceway separation distances are not met inside containment
3.3.00.07d.iii.b	804	Where minimum raceway separation distances are not met inside the non-radiologically controlled area of the auxiliary building
3.3.00.07d.iii.c	805	Where minimum raceway separation distances are not met inside the radiologically controlled area of the auxiliary building
3.3.00.07d.iv.a	806	Areas inside the non-radiologically controlled area of the auxiliary building
3.3.00.07d.iv.b	807	Areas inside the non-radiologically controlled area of the auxiliary building
3.3.00.07d.iv.c	808	Areas inside the radiologically controlled area of the auxiliary building
3.3.00.07d.v.a	809	Areas inside containment
3.3.00.07d.v.b	810	Areas inside the non-radiologically controlled area of the auxiliary building
3.3.00.07d.v.c	811	Areas inside the radiologically controlled area of the auxiliary building