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Docket No.: 52-025

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ND-16-1875
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U.S. Nuclear Regulatory Commission
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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.ii [Index Number 747]

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.ii [Index Number 747] 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.ii [Index Number 747]. 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

Enclosure:

1. Vogtle Electric Generating Plant (VEGP) Unit 3 Completion Plan for Uncompleted ITAAC
Item 3.2.00.03.ii [Index Number 747]

To:

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ND-16-1875
Enclosure 1
Completion Plan

Southern Nuclear Operating Company

ND-16-1875

Enclosure 1

Vogtle Electric Generating Plant (VEGP) Unit 3

**Completion Plan for Uncompleted ITAAC
Item 3.2.00.03.ii [Index No. 747]**

Subject: Uncompleted ITAAC 3.2.00.03.ii [Index No. 747]

ITAAC Statement

Design Commitment

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

Inspections/Tests/Analyses

ii) *See subsection 2.2.5, MCR Emergency Habitability System.*

Acceptance Criteria

ii) *See subsection 2.2.5, MCR Emergency Habitability System.*

ITAAC Completion Description

This ITAAC's design commitment is met by reference to ITAAC Items 1, 2a, 2b, 3a, 3b, 4a, 4b, 5a.i, 5a.ii, 5a.iii, 5b, 6a, 6b, 7a.i, 7a.ii, 7a.iii, 7b.i, 7b.ii, 7c, 7d, 8, 9a, 9b, 10, 11, and 12 in VEGP Unit 3 Combined License (COL), Table 2.2.5-5. Unless otherwise noted, References to Tables herein are references to Tables in VEGP Unit 3 Combined License, Appendix C.

Item 1 verifies that the functional arrangement of the as-built Main Control Room (MCR) Emergency Habitability System (VES) conforms to the functional arrangement described in the design description of VEGP Unit 3 COL Section 2.2.5. Item 2a verifies that the as-built VES components identified in Table 2.2.5-1 as American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) Section III are designed and constructed in accordance with ASME Code Section III requirements. Item 2b verifies that the as-built VES piping identified in Table 2.2.5-2 as ASME Code Section III is designed and constructed in accordance with ASME Code Section III requirements. Item 3a verifies that the pressure boundary welds in components identified in Table 2.2.5-1 as ASME Code Section III meet ASME Code Section III requirements for non-destructive examination. Item 3b verifies that the pressure boundary welds in piping identified in Table 2.2.5-2 as ASME Code Section III meet ASME Code Section III requirements for non-destructive examination. Item 4a verifies that results of the hydrostatic test of the components identified in Table 2.2.5-1 as ASME Code Section III conform with the requirements of the ASME Code Section III. Item 4b verifies that results of the hydrostatic test of the piping components identified in Table 2.2.5-2 as ASME Code Section III conform with the requirements of the ASME Code Section III. Item 5a.i verifies that seismic Category I equipment and valves identified in Table 2.2.5-1 are located on the Nuclear Island. Item 5a.ii verifies that seismic Category I equipment identified in Table 2.2.5-1 can withstand seismic design basis loads without loss of safety function. Item 5a.iii verifies that

the as-built equipment seismic Category I equipment identified in Table 2.2.5-1, including anchorage, is seismically bounded by the tested or analyzed conditions. Item 5b verifies that each of the as-built piping lines identified in Table 2.2.5-2, for which functional capability is required, meets the requirements for functional capability. Item 6a verifies that a simulated test signal exists at the Class 1E equipment identified in Table 2.2.5-1 when the assigned Class 1E division is provided the test signal.

Item 6b 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 7d in Table 3.3-6. Item 7d 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 7a.i verifies that the required the air flow rate from the VES to the MCR is at least 60 scfm and not more than 70 scfm. Item 7a.ii verifies that the VES calculated air storage capacity is greater than or equal to 327,574 scf. Item 7a.iii verifies that the air provided by the VES is of breathable quality. Item 7b.i verifies that with the VES flow rate between 60 and 70 scfm, the MCR pressure boundary is pressurized to greater than or equal to 1/8-in. water gauge with respect to the surrounding area.. Item 7b.ii verifies, by testing with a tracer gas, that air leakage into the MCR is less than or equal to 10 cfm.

Item 7c verifies that the heat loads within the rooms identified in Table 2.2.5-4 are less than or equal to the values specified in the design or that an analysis report exists that concludes: a) The temperature and humidity in the MCR remain within limits for reliable human performance for the 72-hour period, b) The maximum temperature for the 72-hour period for the I&C rooms is less than or equal to 120°F, and c) The maximum temperature for the 72-hour period for the Class 1E dc equipment rooms is less than or equal to 120°F. The requirement for either conformance to the design or performance of analysis applies to each room separately.

Item 7d verifies by testing that the air flow rate at the outlet of the MCR passive filtration system is at least 600 cfm greater than the flow measured by VES-003A/B. Item 8 verifies that the safety-related displays identified in Table 2.2.5-1 can be retrieved in the MCR. Item 9a verifies by stroke testing that controls exist in the MCR to cause remotely operated VES valves identified in Table 2.2.5-1 to perform their active safety functions. Item 9b verifies that the remotely operated valves identified in Table 2.2.5-1 as having PMS control perform the active safety function identified in table 2.2.5-1 after receiving a signal from the PMS. Item 10 verifies that under the conditions of loss of motive power, each remotely operated valve identified in Table 2.2.5-1 assumes the indicated loss of motive power position. Item 11 verifies that the displays identified in Table 2.2.5-3 can be retrieved in the MCR. Item 12 verifies that the background noise level in the MCR does not exceed 65 dB(A) at the operator work stations when the VES is operating.

The ITAAC Closure Notifications (References 1 through 26) 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, 2a, 2b, 3a, 3b, 4a, 4b, 5a.i, 5a.ii, 5a.iii, 5b, 6a, 6b, 7a.i, 7a.ii, 7a.iii, 7b.i, 7b.ii, 7c, 7d, 8, 9a, 9b, 10, 11, and 12 from VEGP Unit 3 COL Table 2.2.5-5 and are available for NRC inspection as part of the ITAAC Completion Package (Reference 27).

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 2.2.05.01 [Index No. 252]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.05.02a [Index No. 253]
3. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.05.02b [Index No. 254]
4. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.05.03a [Index No. 255]
5. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.05.03b [Index No. 256]
6. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.05.04a [Index No. 257]
7. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.05.04b [Index No. 258]
8. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.05.05a.i [Index No. 259]
9. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.05.05a.ii [Index No. 260]
10. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.05.05a.iii [Index No. 261]

11. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.05.05b [Index No. 262]
12. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.05.06a [Index No. 263]
13. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.05.06b [Index No. 264]
14. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.05.07a.i [Index No. 265]
15. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.05.07a.ii [Index No. 266]
16. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.05.07a.iii [Index No. 267]
17. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.05.07b.i [Index No. 268]
18. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.05.07b.ii [Index No. 269]
19. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.05.07c [Index No. 270]
20. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.05.07d [Index No. 271]
21. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.05.08 [Index No. 272]
22. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.05.09a [Index No. 273]
23. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.05.09b [Index No. 274]
24. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.05.10 [Index No. 275]
25. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.05.11 [Index No. 276]
26. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.05.12 [Index No. 277]
27. ITAAC 3.2.00.03.ii Completion Package
28. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A: Item 4 Reference Information

Referenced ITAAC	Index No.	Plant Area addressed
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

Attachment A: Item 4 Reference Information

Referenced ITAAC	Index No.	Plant Area addressed
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