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ND-16-1880
10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission
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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 3.2.00.06.i [Index Number 753]

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 3.2.00.06.i [Index Number 753] has not been completed greater than 225-days prior to initial fuel load. Enclosure 1 describes the plan for completing ITAAC 3.2.00.06.i [Index Number 753]. 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 3.2.00.06.i [Index Number 753]

To:

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ND-16-1880
Enclosure 1
Completion Plan

Southern Nuclear Operating Company

ND-16-1880

Enclosure 1

Vogtle Electric Generating Plant (VEGP) Unit 3

**Completion Plan for Uncompleted ITAAC
Item 3.2.00.06.i [Index No. 753]**

Subject: Uncompleted ITAAC 3.2.00.06.i [Index No. 753]

ITAAC Statement

Design Commitment

6. *The RSR provides a suitable workspace environment, separate from the MCR, for use by the RSW operators.*

Inspections/Tests/Analyses

- i) *See subsection 2.7.1, Nuclear Island Nonradioactive Ventilation System.*

Acceptance Criteria

- i) *See subsection 2.7.1, Nuclear Island Nonradioactive Ventilation System.*

ITAAC Completion Description

This ITAAC Design Commitment is met by reference to ITAAC Items 1, 2a, 2b, 3a, 3b, 4a, 4b, 5i, 5ii, 5iii, 6a, 6b, 7, 8a, 8b, 8c, 8d, 9, 10a, 10b, 11, 12, 13, and 14 in VEGP Unit 3 Combined License (COL) Appendix C Table 2.7.1-4. Table references herein are references to tables in Appendix C of the VEGP Unit 3 COL. Item 1 demonstrates that the as-built Nuclear Island Non-Radioactive Ventilation System (VBS) conforms with the functional arrangement described in the Design Description of VEGP Unit 3 COL Appendix C subsection 2.7.1. Item 2a verifies that the as-built components identified in Table 2.7.1-1 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 piping identified in Table 2.7.1-2 as ASME Code Section III is designed and constructed in accordance with ASME Code Section III requirements. Item 3a verifies that the ASME Code Section III requirements are met for nondestructive examination of pressure boundary welds in components identified in Table 2.7.1-1. Item 3b verifies that the ASME Code Section III requirements are met for nondestructive examination of pressure boundary welds in piping identified in Table 2.7.1-2. Item 4a verifies that the results of the pressure test of the components identified in Table 2.7.1-1 as ASME Code Section III conform with the requirements of the ASME Code Section III. Item 4b verifies that the results of the pressure test of the piping identified in Table 2.7.1-2 as ASME Code Section III conform with the requirements of the ASME Code Section III. Item 5i demonstrates that the seismic Category I equipment identified on Table 2.7.1-1 is located on the Nuclear Island. Item 5ii verifies that the seismic Category I equipment identified on Table 2.7.1-1 can withstand seismic design basis loads without loss of safety function. Item 5iii verifies that the seismic Category I equipment identified on Table 2.7.1-1 is seismically bounded by the tested or analyzed conditions. Item 6a verifies that Class 1E components identified in Table 2.7.1-1 are powered from their respective Class 1E division by

demonstrating that a simulated test signal exists at the Class 1E equipment identified in Table 2.7.1-1 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 7 verifies that the VBS and Sanitary Drainage System (SDS) provide safety-related function to isolate the pipe that penetrates the Main Control Room (MCR) pressure boundary by demonstrating that valves identified in Table 2.7.1-1 as having Protection & Safety Monitoring System (PMS) control perform their active safety function after receiving a signal from PMS. Item 8a verifies that the VBS provides cooling to the MCR, Control Support Area (CSA), Remote Shutdown Room (RSR), and Class 1E electrical rooms by demonstrating that controls in the MCR operate to cause the components listed in Table 2.7.1-3 to perform the listed functions. Item 8b verifies that the VBS provides ventilation cooling to the Class 1E battery rooms by demonstrating that controls in the MCR operate to cause the components listed in Table 2.7.1-3 to perform the listed functions. Item 8c verifies that VBS maintains MCR and CSA habitability when radioactivity is detected by demonstrating that controls in the MCR operate to cause the components listed in Table 2.7.1-3 to perform the listed functions. Item 8d verifies that the VBS provides ventilation cooling to the MCR and the division B&C Class 1E I&C rooms by starting and running the fans listed in Table 2.7.1-3. Item 9 verifies that safety-related displays identified in Table 2.7.1-1 can be retrieved in the MCR. Item 10a demonstrates that controls in the MCR operate to cause the remotely operated valves identified in Table 2.7.1-1 to perform their active functions. Item 10b demonstrates that the valves identified in Table 2.7.1-1 as having PMS control perform their active safety function after receiving a signal from PMS. Item 11 demonstrates that upon loss of motive power, each remotely operated valves identified in Table 2.7.1-1 assumes the indicated loss of motive power position. Item 12 demonstrate that controls in the MCR operate to cause the components listed in Table 2.7.1-3 to perform the listed functions. Item 13 demonstrates that the displays identified in Table 2.7.1-3 can be retrieved in the MCR. Item 14 demonstrates that the background noise level in the MCR and RSR does not exceed 65 dB (A) when the VBS is operating.

The ITAAC Closure Notifications (References 1 through 24) for Items 1, 2a, 2b, 3a, 3b, 4a, 4b, 5i, 5ii, 5iii, 6a, 6b, 7, 8a, 8b, 8c, 8d, 9, 10a, 10b, 11, 12, 13, and 14 in Table 2.7.1-4 summarize the methodology for conducting the Inspections/Tests/Analyses, and the results that demonstrate that the acceptance criteria are satisfied. 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 basis are referenced in the closure notifications for Items 1, 2a, 2b, 3a, 3b, 4a, 4b, 5i, 5ii, 5iii, 6a, 6b, 7, 8a, 8b, 8c, 8d, 9, 10a, 10b, 11, 12, 13, and 14 in Table 2.7.1-4 and are available for NRC inspection as part of the ITAAC Completion Package (Reference 25).

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 2.7.01.01 [Index No. 677]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.7.01.02a [Index No. 678]
3. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.7.01.02b [Index No. 679]
4. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.7.01.03a [Index No. 680]
5. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.7.01.03b [Index No. 681]
6. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.7.01.04a [Index No. 682]
7. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.7.01.04b [Index No. 683]
8. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.7.01.05.i [Index No. 684]
9. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.7.01.05.ii [Index No. 685]
10. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.7.01.05.iii [Index No. 686]
11. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.7.01.06a [Index No. 687]
12. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.7.01.06b [Index No. 688]
13. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.7.01.07 [Index No. 689]
14. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.7.01.08a [Index No. 690]
15. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.7.01.08b [Index No. 691]
16. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.7.01.08c [Index No. 692]
17. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.7.01.08d [Index No. 693]
18. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.7.01.09 [Index No. 694]

19. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.7.01.10a [Index No. 695]
20. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.7.01.10b [Index No. 696]
21. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.7.01.11 [Index No. 697]
22. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.7.01.12 [Index No. 698]
23. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.7.01.13 [Index No. 699]
24. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.7.01.14 [Index No. 700]
25. ITAAC 3.2.00.03.i Completion Package
26. 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