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Docket No.: 52-025

SEP 30 2016

ND-16-1884
10 CFR 52.99(c)(3)

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 3.3.00.02a.i.b [Index Number 761]

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 3.3.00.02a.i.b [Index Number 761] has not been completed greater than 225-days prior to initial fuel load. Enclosure 1 describes the plan for completing ITAAC 3.3.00.02a.i.b [Index Number 761]. 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 3.3.00.02a.i.b [Index Number 761]

To:

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Enclosure 1
Completion Plan

Southern Nuclear Operating Company

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Enclosure 1

Vogtle Electric Generating Plant (VEGP) Unit 3

**Completion Plan for Uncompleted ITAAC
Item 3.3.00.02a.i.b [Index No. 761]**

Subject: Uncompleted ITAAC 3.3.00.02a.i.b [Index No. 761]

ITAAC Statement

Design Commitment

- 2.a) *The nuclear island structures, including the critical sections listed in Table 3.3-7, are seismic Category I and are designed and constructed to withstand design basis loads as specified in the Design Description, without loss of structural integrity and the safety-related functions.*

Inspections/Tests/Analyses

- i) *An inspection of the nuclear island structures will be performed. Deviations from the design due to as-built conditions will be analyzed for the design basis loads.*

Acceptance Criteria

- i.b) *A report exists which reconciles deviations during construction and concludes that the as-built shield building structures, including the critical sections, conform to the approved design and will withstand the design basis loads specified in the Design Description without loss of structural integrity or the safety-related functions.*

ITAAC Completion Description

Multiple ITAAC are performed to demonstrate that the nuclear island structures, including the critical sections listed in VEGP Unit 3 Combined License (COL) Appendix C Table 3.3-7 (Attachment A), are seismic Category I and are designed and constructed to withstand design basis loads as specified in the VEGP Unit 3 COL Appendix C Section 3.3 Design Description, without loss of structural integrity and the safety-related functions. The subject ITAAC verifies inspections of the as-built shield building structures, including the critical sections, and reconciles deviations during construction to the approved design such that the as-built structures will withstand design basis loads without loss of structural integrity or the safety-related functions.

Design bases loads are defined in VEGP Unit 3 COL Appendix C Section 3.3 as those loads associated with:

- Normal plant operation (including dead loads, live loads, lateral earth pressure loads, and equipment loads, including hydrodynamic loads, temperature and equipment vibration);
- External events (including rain, snow, flood, tornado, tornado generated missiles and earthquake); and
- Internal events (including flood, pipe rupture, equipment failure, and equipment failure generated missiles).

VEGP 3&4 Updated Final Safety Analysis Report, Section 3.7 "Seismic Design", Section 3.8 "Design of Category I Structures", and Appendix 3H "Auxiliary and Shield Building Critical Sections" describe the analyses for the design basis loads for the NI Structures. Section 3.8 specifies the applicable codes and standards governing the design, materials, fabrication,

construction inspection and testing for the NI structures. Section 3.8 also describes the as-built design summary reports which document that the seismic Category I structures meet the specified acceptance criteria.

The shield building structures, including the critical sections, listed in Attachment A, are constructed as designed and specified in the VEGP Unit 3 COL Appendix C Section 3.3 Design Description to withstand the Design Description design basis loads without loss of structural integrity and the safety-related functions.

The shield building structures, including the critical sections, listed in Attachment A are inspected during construction to verify the as-built structures conform to the specified design, codes and standards. Identified structural deviations are documented, evaluated, and reconciled by engineering to confirm the structures' ability to withstand design basis loads. The reports identified in References 1 and 2 exist and document the reconciliation of NI structural deviations identified during construction and conclude that the as-built shield building structures, including the critical sections, will withstand the design basis loads specified in the Design Description without loss of structural integrity or the safety-related functions.

References 1 and 2 are available for NRC inspection as part of the ITAAC 3.3.00.02a.i.b Completion Package (Reference 3).

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 one closed (1) Non-Cited Violation and one closed (1) Severity Level IV Violation associated with this ITAAC.

1. 05200025/2015-002-01 (Closed) – Failure to translate the design basis for the design of welded connections between structural steel plates and mechanical couplers, used for the attachment of concrete anchors to the plates, into specifications, drawings, procedures, and instructions.
 - a. The ITAAC completion review determined that all corrective actions associated with this finding are completed and closed. NRC closure of this finding is documented in NRC Inspection Report 05200025/2015-004
2. 05200025/2012-008-01 (Closed) – Failure to assure design services were accomplished with the appropriate design control measures.
 - a. The ITAAC completion review determined that all corrective actions associated with this finding are completed and closed. NRC closure of this finding is documented in NRC Inspection Report 05200025/2012-004

Before submission of the ICN, corrective actions will be completed for all relevant ITAAC findings identified prior to ICN submission.

References (available for NRC inspection)

1. As-Built Summary Report for Basemat / Dish Under CV to EL 100'-0"(AAA-BB-CCC-###)
2. As-Built Summary Report for Shield Building Cylinder Wall SC Portions / Shield Building Tension Ring and Roof (FFF-GG-HHH-###)
3. ITAAC 3.3 00.02a.i.b Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A: Excerpt of COL Appendix C Table 3.3-7

Shield Building

Roof slab at elevation 180'-0" adjacent to shield building cylinder
Shield building roof, exterior wall of the PCS water storage tank
Shield building roof, interior wall of the PCS water storage tank
Shield building roof, tension ring and air inlets
Shield building SC cylinder
Shield building SC to RC connection

Nuclear Island Critical Structural Sections