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ND-16-1982  
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 2.2.05.02b [Index Number 254]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of October 14, 2016, Vogtle Electric Generating Plant (VEGP) Unit 3 Uncompleted Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) Item 2.2.05.02b [Index Number 254] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.2.05.02b [Index Number 254]. 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

U.S. Nuclear Regulatory Commission

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Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion Plan for Uncompleted ITAAC 2.2.05.02b [Index Number 254]

MJY/kms/amm

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**Southern Nuclear Operating Company  
ND-16-1982  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion Plan for Uncompleted ITAAC 2.2.05.02b [Index Number 254]**

**Subject: Uncompleted ITAAC 2.2.05.02b [Index No. 254]**

### **ITAAC Statement**

#### **Design Commitment**

*2.b) The 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.*

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

*Inspection will be conducted of the as-built piping as documented in the ASME design reports.*

#### **Acceptance Criteria**

*The ASME Code Section III design reports exist for the as-built piping identified in Table 2.2.5-2 as ASME Code Section III.*

### **ITAAC Completion Description**

An inspection is performed in accordance with the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (BPVC) Section III (Reference 1) to demonstrate that the as-built piping identified in VEGP Unit 3 Combined License (COL) Appendix C Table 2.2.5-2 as ASME Code Section III (Attachment A) is designed and constructed in accordance with ASME Code Section III requirements. This ITAAC is complete once the as-built ASME Code Section III design reports for the piping in Attachment A are completed, the piping is stamped with a Code Symbol N-Stamp, and the Authorized Nuclear Inspector (ANI) has signed the N-5 Code Data Report(s) (Reference 2) listed in Attachment A indicating the as-built piping is installed in accordance with ASME Code Section III requirements.

The as-built piping listed in Attachment A is subjected to a design report reconciliation process which verifies that the as-built piping complies with all design specification and Code provisions. Design reconciliation of the as-built piping validates that construction completion, including field changes and any nonconforming condition dispositions, is consistent with and bounded by the approved design. All applicable fabrication, installation and testing records, as well as those for the related Quality Assurance verification and inspection activities, which confirm adequate construction in compliance with ASME Code Section III and the design provisions, are referenced in the N-5 Code Data Report(s) and its sub-tier references.

The completed ASME Code Section III design reports for the as-built piping identified in Attachment A exist and document that the piping conforms to approved design details. The design reports support completion of the N-5 Code Data Report(s) signed by the Authorized Nuclear Inspector.

The completion of the piping Code Symbol N-Stamp stamping, and the N-5 Code Data Report(s) which incorporate the design reports for the piping listed in Attachment A, confirm that the as-built piping is designed and constructed in accordance with ASME Code Section III requirements. The N-5 Code Data Report(s) and associated ASME Code Section III design reports are available for NRC inspection as part of the ITAAC 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 there are no relevant ITAAC findings associated with this ITAAC.

### **References (available for NRC inspection)**

1. American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (BPVC) Section III requirements as described in VEGP 3&4 Updated Final Safety Analysis Report, Section 5.2.1, Compliance with Codes and Code Cases
2. ASME Section III N-5 Code Data Report(s) XXX identified in Attachment A
3. ITAAC 2.2.05.02b Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Attachment A: Excerpt from COL Appendix C Table 2.2.5-2**

<b>Line Name</b>	<b>Line Number</b>	<b>ASME Code Section III</b>	<b>N-5 Code Data Report</b>
MCR Relief Line	VES-PL-022A	Yes	XXX
MCR Relief Line	VES-PL-022B	Yes	XXX