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Docket No.: 52-025

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ND-16-1984  
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 2.2.05.04b [Index Number 258]

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 2.2.05.04b [Index Number 258] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.2.05.04b [Index Number 258]. 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 2.2.05.04b [Index Number 258]

MJY/kms/amm

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**Southern Nuclear Operating Company  
ND-16-1984  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion Plan for Uncompleted ITAAC 2.2.05.04b [Index Number 258]**

**Subject: Uncompleted ITAAC 2.2.05.04b [Index No. 258]**

### **ITAAC Statement**

#### **Design Commitment**

- 4.b) *The piping identified in Table 2.2.5-2 as ASME Code Section III retains its pressure boundary integrity at its design pressure.*

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

*A hydrostatic test will be performed on the piping required by the ASME Code Section III to be hydrostatically tested.*

#### **Acceptance Criteria**

*A report exists and concludes that the results of the hydrostatic test of the piping identified in Table 2.2.5-2 as ASME Code Section III conform with the requirements of the ASME Code Section III.*

### **ITAAC Completion Description**

Hydrostatic tests are performed to verify that the piping identified in VEGP Unit 3 Combined License (COL) Appendix C Table 2.2.5-2 (Attachment A) as American Society of Mechanical Engineers (ASME) Code Section III retains its pressure boundary integrity at its design pressure. This ITAAC verifies that the piping identified in Attachment A fully meets all applicable ASME Boiler & Pressure Vessel Code Section III (Reference 1) requirements and retains its pressure boundary integrity at its design pressure.

A hydrostatic test is performed in accordance with procedure XYZ (as applicable) that complies with Reference 1 requirements to demonstrate that the piping identified in Attachment A as ASME Code Section III retains its pressure boundary integrity at its design pressure. The hydrostatic test verifies that there are no leaks at welds or piping, and that the pressure boundary integrity is retained at its design pressure.

The hydrostatic testing results of the piping are documented in the Hydrostatic Testing Report(s). The Hydrostatic Testing Report(s) supports completion of the ASME Section III N-5 Code Data Report(s) XXX (Reference 2) identified in Attachment A for the applicable piping system.

The applicable ASME Section III N-5 Code Data Reports identified in Attachment A exist and document that the results of the hydrostatic testing of the piping identified in VEGP Unit 3 COL Appendix C Table 2.2.5-2 as ASME Code Section III conform with the requirements of the ASME Code Section III. The N-5 Code Data Reports identified in Attachment A 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 XXX identified in Attachment A
3. ITAAC 2.2.05.04b Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Attachment A: Excerpt from VEGP Unit 3 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