

M. J. Yox
Regulatory Affairs Director
Vogtle 3&4
Nuclear Development

Southern Nuclear
Operating Company, Inc.
7825 River Road
Waynesboro, GA 30830

Tel 706.848.6459



Docket No.: 52-025

OCT 20 2016

ND-16-1975
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 2.1.02.05b [Index Number 22]

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 2.1.02.05b [Index Number 22] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.1.02.05b [Index Number 22]. 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
ND-16-1975
Page 2 of 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3
Completion Plan for Uncompleted ITAAC 2.1.02.05b [Index Number 22]

MJY/kms/amm

To:

Southern Nuclear Operating Company/Georgia Power Company

Mr. S. E. Kuczynski (w/o enclosures)

Mr. D. A. Bost (w/o enclosures)

Mr. M. D. Meier

Mr. M. D. Rauckhorst (w/o enclosures)

Mr. D. H. Jones (w/o enclosures)

Ms. K. D. Fili

Mr. D. L. McKinney

Mr. B. H. Whitley

Mr. D. L. Fulton

Mr. C. E. Morrow

Mr. M. J. Yox

Mr. D. Woods

Ms. A. L. Pugh

Ms. K. M. Stacy

Mr. A. S. Parton

Mr. W. A. Sparkman

Mr. J. P. Redd

Mr. D. R. Culver

Mr. F. H. Willis

Document Services RTYPE: VND.LI.L06

File AR.01.02.06

cc:

Nuclear Regulatory Commission

Ms. C. Haney (w/o enclosures)

Ms. A. Bradford (w/o enclosures)

Ms. J. L. Dixon-Herrity (w/o enclosures)

Ms. J. M. Heisserer

Mr. C. J. Even

Mr. C. P. Patel

Mr. B. M. Baval

Ms. R. C. Reyes

Ms. M. A. Sutton

Mr. M. E. Ernestes

Mr. G. J. Khouri

Mr. J. D. Fuller

Mr. T. E. Chandler

Ms. S. E. Temple

Ms. P. Braxton

Mr. T. C. Brimfield

Mr. A. J. Lerch

Oglethorpe Power Corporation

Mr. M. W. Price

Ms. K. T. Haynes

Ms. A. Whaley

Municipal Electric Authority of Georgia

Mr. J. E. Fuller

Mr. S. M. Jackson

Dalton Utilities

Mr. D. Cope

WECTEC

Mr. C. A. Castell

Westinghouse Electric Company, LLC

Mr. R. Easterling (w/o enclosures)

Mr. J. W. Crenshaw (w/o enclosures)

Mr. L. Woodcock (w/o enclosures)

Mr. C. F. Landon

Mr. A. F. Dohse

Mr. M. Y. Shaqqo

Ms. S. DiTommaso

Other

Mr. J. E. Hesler, *Bechtel Power Corporation*

Ms. L. Matis, *Tetra Tech NUS, Inc.*

Dr. W. R. Jacobs, Jr., *Ph.D., GDS Associates, Inc.*

Mr. S. Roetger, *Georgia Public Service Commission*

Ms. S. W. Kernizan, *Georgia Public Service Commission*

Mr. K. C. Greene, *Troutman Sanders*

Mr. S. Blanton, *Balch Bingham*

**Southern Nuclear Operating Company
ND-16-1975
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3
Completion Plan for Uncompleted ITAAC 2.1.02.05b [Index Number 22]**

Subject: Uncompleted ITAAC 2.1.02.05b [Index No. 22]

ITAAC Statement

Design Commitment

- 5.b) *Each of the lines identified in Table 2.1.2-2 for which functional capability is required is designed to withstand combined normal and seismic design basis loads without a loss of its functional capability.*

Inspections/Tests/Analyses

Inspection will be performed for the existence of a report verifying that the as-built piping meets the requirements for functional capability.

Acceptance Criteria

A report exists and concludes that each of the as-built lines identified in Table 2.1.2-2 for which functional capability is required meets the requirements for functional capability.

ITAAC Completion Description

An inspection is performed for the existence of a report concluding that each of the as-built piping lines identified in VEGP Unit 3 Combined License (COL) Appendix C Table 2.1.2-2 (Attachment A) for which functional capability is required is designed to withstand combined normal and seismic design basis loads without a loss of its functional capability. "Functional capability", in this context, refers to the capability of the piping to withstand the effects of earthquakes without a loss of safety function (to convey fluids from one location to another). Specific functional capability requirements are defined in the VEGP 3&4 Updated Final Safety Analysis Report, Section 3.9, Table 3.9-11, Piping Functional Capability – ASME Class 1, 2, and 3 (Reference 1). These requirements are based on NUREG-1367, Functional Capability of Piping Systems, (Reference 2).

Piping functional capability is not a specific American Society of Mechanical Engineers (ASME) Code requirement but it is a requirement in Reference 1. As such, information demonstrating that Reference 1 functional capability requirements are met is included in the ASME Code Section III As-Built Design Reports for safety class piping prepared in accordance with ASME Code Section III NCA-3550 under the ASME Boiler & Pressure Vessel Code Section III (Reference 3) requirements. The as-built piping identified in Attachment A is subjected to a reconciliation process which verifies that the as-built piping is analyzed for functional capability, and for compliance with the design specification and ASME 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. As required by ASME Code Section III, the As-Built Design Reports (Reference 4) include the results of physical inspection of the piping and reconciliation to the design pipe stress report.

The ASME Code Section III As-Built Piping Design Reports for the piping lines identified in VEGP Unit 3 COL Appendix C Table 2.1.2-2 exist and conclude that each of the as-built piping lines for which functional capability is required meets the requirements for functional capability. The ASME Code Section III As-Built Piping Design Reports for each of the as-built piping lines are identified in Attachment A and are available for NRC inspection as part of the ITAAC Completion Package (Reference 5).

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. VEGP 3&4 Updated Final Safety Analysis Report, Section 3.9, Table 3.9-11, Piping Functional Capability – ASME Class 1, 2, and 3
2. NUREG-1367, "Functional Capability of Piping Systems," Nuclear Regulatory Commission, November 1992
3. 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
4. As-Built Piping Design Reports for the piping lines identified in Attachment A
5. ITAAC 2.1.02.05b Completion Package
6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A: Excerpt from COL Appendix C Table 2.1.2-2

| Line Name | Line No. | Functional Capability Required | ASME III As-Built Design Report |
|-------------------------------------|---|---------------------------------------|--|
| Hot Legs | RCS-L001A RCS-L001B | Yes | XXX |
| Cold Legs | RCS-L002A RCS-L002B RCS-L002C RCS-L002D | Yes | XXX |
| Pressurizer Surge Line | RCS-L003 | Yes | XXX |
| ADS Inlet Headers | RCS-L004A/B RCS-L006A/B RCS-L030A/B RCS-L020A/B | Yes | XXX |
| Safety Valve Inlet Piping | RCS-L005A RCS-L005B | Yes | XXX |
| Safety Valve Discharge Piping | RCS-L050A/B RCS-L051A/B | Yes | XXX |
| ADS First-stage Valve Inlet Piping | RCS-L010A/B RCS-L011A/B | Yes | XXX |
| ADS Second-stage Valve Inlet Piping | RCS-L021A/B RCS-L022A/B | Yes | XXX |
| ADS Third-stage Valve Inlet Piping | RCS-L131 RCS-L031A/B RCS-L032A/B | Yes | XXX |
| ADS Outlet Piping | RCS-L012A/B RCS-L023A/B RCS-L033A/B RCS-L061A/B RCS-L063A/B RCS-L200 RCS-L069A/B PXS-L130A/B | Yes | XXX |
| ADS Fourth-stage Inlet Piping | RCS-L133A/B RCS-L135A/B RCS-L136A/B RCS-L137A/B | Yes | XXX |