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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 2.2.01.06d.ii [Index Number 106]

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 2.2.01.06d.ii [Index Number 106] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.2.01.06d.ii [Index Number 106]. 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 2.2.01.06d.ii [Index Number 106]

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**Southern Nuclear Operating Company
ND-16-2136
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3
Completion Plan for Uncompleted ITAAC 2.2.01.06d.ii [Index Number 106]**

Subject: Uncompleted ITAAC 2.2.01.06d.ii [Index No. 106]

ITAAC Statement

Design Commitment

- 6.d) *The non-Class 1E electrical penetrations identified in Table 2.2.1-1 as being qualified for a harsh environment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of containment pressure boundary integrity.*

Inspections/Tests/Analyses

- ii) *Inspection will be performed of the as-built non-Class 1E electrical penetrations located in a harsh environment.*

Acceptance Criteria

- ii) *A report exists and concludes that the as-built non-Class 1E electrical penetrations identified in Table 2.2.1-1 as being qualified for a harsh environment are bounded by type tests, analyses, or a combination of type tests and analyses.*

ITAAC Completion Description

Multiple ITAAC are performed to demonstrate that the non-Class 1E electrical penetrations identified in VEGP Unit 3 Combined License (COL) Appendix C Table 2.2.1-1 (Attachment A) as being qualified for a harsh environment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of containment pressure boundary integrity. The subject ITAAC requires that an inspection is performed of the as-built non-Class 1E electrical penetrations located in a harsh environment.

Harsh environment qualification of the non-Class 1E electrical penetrations in VEGP Unit 3 COL Appendix C Table 2.2.1-1 is verified by type tests, analyses, or a combination of type tests and analyses in accordance with ITAAC 2.2.01.06d.i (Reference 1). Equipment Qualification Data Packages (EQDP) and Equipment Qualification Summary Reports (EQSR) identify the equipment mounting employed for qualification and the environmental conditions tested or analyzed.

In accordance with Equipment Qualification (EQ) Walkdown Inspection Procedure XYZ (Reference 2), an inspection is conducted of the Containment System (CNS) to confirm the satisfactory installation of the non-Class 1E electrical penetrations. The inspection includes verification of equipment make/model/serial number; verification of the equipment mounting, wiring, cables, and terminations; and verification of equipment location to confirm that the harsh

environmental conditions for the room in which the equipment is mounted are bounded by the tested or analyzed conditions.

The documentation of installed configuration of harsh environment qualified equipment includes photographs and/or sketches of equipment mounting and connections. The verification of installed equipment configuration is documented in the EQ As-Built Reconciliation Report(s) (Reference 3).

Attachment A identifies the EQ As-Built Reconciliation Report(s) which verify that the installed configuration of the non-Class 1E electrical penetrations identified in VEGP Unit 3 COL Appendix C Table 2.2.1-1 including the associated wiring, cables, and terminations are bounded by the qualified configuration and IEEE Standard 323-1974 (Reference 4). The EQ As-Built Reconciliation Report(s) 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. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.01.06d.i [Index No. 105]
2. EQ Walkdown Inspection Procedure XYZ
3. EQ As-Built Reconciliation Report(s) as identified in Attachment A
4. IEEE Standard 323-1974, "IEEE Standard for Qualifying Class 1E Equipment for Nuclear Power Generating Stations"
5. ITAAC 2.2.01.06d.ii 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 2.2.1-1

ITAAC COMPLIANCE MATRIX FOR HARSH ENVIRONMENT
QUALIFIED EQUIPMENT
(CONTAINMENT SYSTEM)

Equipment Name	Tag No.	Class 1E/Qual. For Harsh Envir.	EQ As-Built Reconciliation Report(s)
Electrical Penetration P03	DAS-EY-P03Z	No/Yes	XXX
Electrical Penetration P01	ECS-EY-P01X	No/Yes	XXX
Electrical Penetration P02	ECS-EY-P02X	No/Yes	XXX
Electrical Penetration P06	ECS-EY-P06Y	No/Yes	XXX
Electrical Penetration P07	ECS-EY-P07X	No/Yes	XXX
Electrical Penetration P09	ECS-EY-P09W	No/Yes	XXX
Electrical Penetration P10	ECS-EY-P10W	No/Yes	XXX
Electrical Penetration P17	ECS-EY-P17X	No/Yes	XXX
Electrical Penetration P18	ECS-EY-P18X	No/Yes	XXX
Electrical Penetration P19	ECS-EY-P19Z	No/Yes	XXX
Electrical Penetration P20	ECS-EY-P20Z	No/Yes	XXX
Electrical Penetration P21	EDS-EY-P21Z	No/Yes	XXX
Electrical Penetration P22	ECS-EY-P22X	No/Yes	XXX
Electrical Penetration P23	ECS-EY-P23X	No/Yes	XXX
Electrical Penetration P24	ECS-EY-P24	No/Yes	XXX
Electrical Penetration P25	ECS-EY-P25W	No/Yes	XXX
Electrical Penetration P26	ECS-EY-P26W	No/Yes	XXX