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ND-16-2131  
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 2.2.04.06 [Index Number 230]

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 2.2.04.06 [Index Number 230] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.2.04.06 [Index Number 230]. 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 2.2.04.06 [Index Number 230]

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**Southern Nuclear Operating Company  
ND-16-2131  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion Plan for Uncompleted ITAAC 2.2.04.06 [Index Number 230]**

**Subject: Uncompleted ITAAC 2.2.04.06 [Index No. 230]**

## **ITAAC Statement**

### **Design Commitment**

6. *Each of the as-built lines identified in Table 2.2.4-2 as designed for LBB meets the LBB criteria, or an evaluation is performed of the protection from the dynamic effects of a rupture of the line.*

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

*Inspection will be performed for the existence of an LBB evaluation report or an evaluation report on the protection from dynamic effects of a pipe break. Section 3.3, Nuclear Island Buildings, contains the design descriptions and inspections, tests, analyses, and acceptance criteria for protection from the dynamic effects of pipe rupture.*

### **Acceptance Criteria**

*An LBB evaluation report exists and concludes that the LBB acceptance criteria are met by the as-built SGS piping and piping materials or a pipe break evaluation report exists and concludes that protection from the dynamic effects of a line break is provided.*

## **ITAAC Completion Description**

Inspections are performed for the as-built lines identified in VEGP Unit 3 Combined License (COL) Appendix C Table 2.2.4-2 (Attachment A) to verify that each of the as-built lines designed for Leak Before Break (LBB) meets the LBB criteria, or an evaluation is performed of the protection from the dynamic effects of a rupture of the line. VEGP Unit 3 COL Appendix C, Section 3.3, Nuclear Island Buildings, contains the design descriptions and inspections, tests, analyses, and acceptance criteria for protection from the dynamic effects of pipe rupture.

LBB evaluations are performed to confirm that the as-built Steam Generator System (SGS) piping (and corresponding piping materials) identified in Attachment A meet the LBB acceptance criteria described in VEGP 3&4 Updated Final Safety Analysis Report, Appendix 3B, Leak-Before-Break Evaluation of the AP1000 Piping (Reference 1). In cases where an as-built SGS piping line in Attachment A cannot meet the LBB acceptance criteria, a pipe break evaluation is performed which concludes that protection from the dynamic effects of a line break is provided. The pipe break evaluation criteria is discussed in VEGP 3&4 Updated Final Safety Analysis Report, Section 3.6.4.1, Pipe Break Hazards Analysis (Reference 2) and is documented as a pipe rupture hazards analysis report (pipe break evaluation report).

Inspections are performed to verify that LBB as-built piping evaluation reports exist for the SGS piping (and corresponding piping materials) identified in Attachment A which conclude that the LBB acceptance criteria is met, and are documented in either the applicable American Society

of Mechanical Engineers (ASME) Section III as-built piping design report(s) or in separate LBB evaluation report(s). For cases where an as-built SGS piping line in Attachment A cannot meet the LBB acceptance criteria inspections are performed to verify that a pipe rupture hazards analysis report (pipe break evaluation report) exists which concludes that protection from the dynamic effects of a line break is provided.

The applicable ASME Section III as-built piping design report(s), LBB evaluation report(s), or pipe rupture hazards analysis report(s) (pipe break evaluation report(s)) exist and are identified in Attachment A. These report(s) 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. VEGP 3&4 Updated Final Safety Analysis Report, Appendix 3B, Leak-Before-Break Evaluation of the AP1000 Piping
2. VEGP 3&4 Updated Final Safety Analysis Report, Section 3.6.4.1, Pipe Break Hazards Analysis
3. ITAAC 2.2.04.06 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 2.2.4-2**

<b>Line Name</b>	<b>Line Number</b>	<b>Leak Before Break</b>	<b>ASME Section III Design Report, LBB Evaluation Report, Pipe Rupture Hazards Analysis Report or Pipe Break Evaluation Report No.</b>
Main Steam Line (within containment)	SGS-PL-L006A, L006B	Yes	XXX