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ND-16-2125  
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 2.2.04.05b [Index Number 229]

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 2.2.04.05b [Index Number 229] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.2.04.05b [Index Number 229]. 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 2.2.04.05b [Index Number 229]

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**Southern Nuclear Operating Company  
ND-16-2125  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion Plan for Uncompleted ITAAC 2.2.04.05b [Index Number 229]**

**Subject: Uncompleted ITAAC 2.2.04.05b [Index No. 229]**

### **ITAAC Statement**

#### **Design Commitment**

*5.b) Each of the lines identified in Table 2.2.4-2 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 concluding 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 2.2.4-2 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 Steam Generator System (SGS) as-built piping lines identified in VEGP Unit 3 Combined License (COL) Appendix C Table 2.2.4-2 (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 Design Reports for the SGS piping lines identified in VEGP Unit 3 COL Appendix C Table 2.2.4-2 exist and conclude that each of the as-built SGS piping lines for which functional capability is required meets the requirements for functional capability. The ASME Code Section III As-Built Design Reports for each of the as-built SGS 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 Design Reports identified in Attachment A
5. ITAAC 2.2.04.05b 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 2.2.4-2**

<b>Line Name</b>	<b>Line Number</b>	<b>Functional Capability Required</b>	<b>ASME III As-Built Design Report</b>
Main Steam Line (within containment)	SGS-PL-L006A, L006B	Yes	XXX
Main Steam Line (outside of containment)	SGS-PL-L006A, L006B	Yes	XXX
Safety Valve Inlet Line	SGS-PL-L015A, L015B, L015C, L015D, L015E, L015F, L015G, L015H, L015J, L015K, L015L, L015M	Yes	XXX
Safety Valve Discharge Line	SGS-PL-L018A, L018B, L018C, L018D, L018E, L018F, L018G, L018H, L018J, L018K, L018L, L018M	Yes	XXX