

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 28 2016**

ND-16-2179  
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 2.2.01.08 [Index Number 109]

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 2.2.01.08 [Index Number 109] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.2.01.08 [Index Number 109]. 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-16-2179

Page 2 of 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion Plan for Uncompleted ITAAC 2.2.01.08 [Index Number 109]

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-16-2179  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion Plan for Uncompleted ITAAC 2.2.01.08 [Index Number 109]**

**Subject: Uncompleted ITAAC 2.2.01.08 [Index No. 109]**

## **ITAAC Statement**

### **Design Commitment**

8. *Containment electrical penetration assemblies are protected against currents that are greater than the continuous ratings.*

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

*An analysis for the as-built containment electrical penetration assemblies will be performed to demonstrate (1) that the maximum current of the circuits does not exceed the continuous rating of the containment electrical penetration assembly, or (2) that the circuits have redundant protection devices in series and that the redundant current protection devices are coordinated with the containment electrical penetration assembly's rated short circuit thermal capacity data and prevent current from exceeding the continuous current rating of the containment electrical penetration assembly.*

### **Acceptance Criteria**

*Analysis exists for the as-built containment electrical penetration assemblies and concludes that the penetrations are protected against currents which are greater than their continuous ratings.*

## **ITAAC Completion Description**

An analysis is performed to verify the as-built containment electrical penetration assemblies are protected against currents that are greater than the continuous ratings. The analysis demonstrates that either (1) the maximum current of the circuits does not exceed the continuous rating of the containment electrical penetration assembly, or (2) that the circuits have redundant protection devices in series and that the redundant current protection devices are coordinated with the containment electrical penetration assembly's rated short circuit thermal capacity data and prevent current from exceeding the continuous current rating of the containment electrical penetration assembly. The containment electrical penetration assemblies analyzed are listed in Attachment A.

The electrical penetrations are designed in accordance with IEEE Standard 317-1983 (Reference 1). Qualification testing of the electrical penetrations is performed in accordance with IEEE Standard 317-1983 and IEEE Standard 323-1974 (Reference 2). The analysis of the as-built containment electrical penetration assemblies include the applicable coordination calculations for the Main AC Power System (ECS), the Class 1E DC and Uninterruptible Power Supply System (IDS), the Non-Class 1E DC and Uninterruptible Power Supply System (EDS) and the Diverse Actuation System (DAS). The analysis results, including the supporting calculations, are contained in the Principal Closure Document XXX (Reference 3) supporting the

ITAAC 2.2.01.08 Completion Package (Reference 4). The analysis results exist for the as-built containment electrical penetration assemblies and conclude that the penetrations are protected against currents which are greater than their continuous ratings.

Principal Closure Document XXX is available for NRC inspection as part of the ITAAC 2.2.01.08 Completion Package.

### **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. IEEE Standard 317-1983, "IEEE Standard for Electrical Penetration Assemblies in Containment Structures for Nuclear Power Generating Stations"
2. IEEE Standard 323-1974, "IEEE Standard for Qualifying Class 1E Equipment for Nuclear Power Generating Stations"
3. Principal Closure Document XXX
4. ITAAC 2.2.01.08 Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

## **Attachment A**

Containment System Electrical Penetration Assemblies (EPAs)

## Attachment A

### Containment System Electrical Penetration Assemblies (EPAs)

Tag No.	EPA Description – Equipment Name
DAS-EY-P03Z	Electrical Penetration P03
ECS-EY-P01X	Electrical Penetration P01
ECS-EY-P02X	Electrical Penetration P02
ECS-EY-P06Y	Electrical Penetration P06
ECS-EY-P07X	Electrical Penetration P07
ECS-EY-P09W	Electrical Penetration P09
ECS-EY-P10W	Electrical Penetration P10
IDSA-EY-P11Z	Electrical Penetration P11
IDSA-EY-P12Y	Electrical Penetration P12
IDSA-EY-P13Y	Electrical Penetration P13
IDSD-EY-P14Z	Electrical Penetration P14
IDSD-EY-P15Y	Electrical Penetration P15
IDSD-EY-P16Y	Electrical Penetration P16
ECS-EY-P17X	Electrical Penetration P17
ECS-EY-P18X	Electrical Penetration P18
ECS-EY-P19Z	Electrical Penetration P19
ECS-EY-P20Z	Electrical Penetration P20
EDS-EY-P21Z	Electrical Penetration P21
ECS-EY-P22X	Electrical Penetration P22
ECS-EY-P23X	Electrical Penetration P23
ECS-EY-P24	Electrical Penetration P24
ECS-EY-P25W	Electrical Penetration P25
ECS-EY-P26W	Electrical Penetration P26
IDSC-EY-P27Z	Electrical Penetration P27
IDSC-EY-P28Y	Electrical Penetration P28
IDSC-EY-P29Y	Electrical Penetration P29
IDSB-EY-P30Z	Electrical Penetration P30
IDSB-EY-P31Y	Electrical Penetration P31
IDSB-EY-P32Y	Electrical Penetration P32