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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 2.2.02.05b [Index Number 129]

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 2.2.02.05b [Index Number 129] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.2.02.05b [Index Number 129]. 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 2.2.02.05b [Index Number 129]

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**Southern Nuclear Operating Company
ND-16-2173
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3
Completion Plan for Uncompleted ITAAC 2.2.02.05b [Index Number 129]**

Subject: Uncompleted ITAAC 2.2.02.05b [Index No. 129]

ITAAC Statement

Design Commitment

5.b) Each of the pipelines identified in Table 2.2.2-2 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 concluding that the as-built pipelines meet the requirements for functional capability.

Acceptance Criteria

A report exists and concludes that each of the as-built pipelines identified in Table 2.2.2-2 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 Passive Containment Cooling System (PCS) as-built pipelines identified in VEGP Unit 3 Combined License (COL) Appendix C Table 2.2.2-2 (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 pipelines 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 pipelines identified in Attachment A are subjected to a reconciliation process which verifies that the as-built pipelines are analyzed for functional capability, and for compliance with the design specification and ASME Code provisions. Design reconciliation of the as-built pipelines 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 pipelines and reconciliation to the design pipe stress report.

The ASME Code Section III As-Built Design Reports for the PCS pipelines identified in VEGP Unit 3 COL Appendix C Table 2.2.2-2 exist and conclude that each of the as-built PCS pipelines 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 PCS pipelines 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 2.2.02.05b 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 2.2.2-2

Pipeline Name	Line Number	Functional Capability Required	ASME III As-Built Design Report
PCCWST Discharge Lines	PCS-PL-L001A/B/C/D	Yes	XXX
PCCWST Discharge Cross-connect Line	PCS-PL-L002	Yes	XXX
PCCWST Discharge Header Lines	PCS-PL-L003A/B PCS-PL-L005	Yes	XXX
Post-72-hour Supply Line Connection	PCS-PL-L051 PCS-PL-L054 PCS-PL-L065	Yes	XXX
Post-72-hour Containment Cooling Makeup From Supply Line Connections	PCS-PL-L004 PCS-PL-L007 PCS-PL-L008 PCS-PL-L023 PCS-PL-L050	Yes	XXX
Post-72-hour SFS Makeup From PCCWST	PCS-PL-L011 PCS-PL-L017 PCS-PL-L018 PCS-PL-L030* PCS-PL-L039* PCS-PL-L041 PCS-PL-L049* PCS-PL-L073	Yes	XXX
Post-72-hour SFS Makeup From Supply Line Connection	PCS-PL-L025 PCS-PL-L029 PCS-PL-L030* PCS-PL-L039* PCS-PL-L048 PCS-PL-L049* PCS-PL-L052	Yes	XXX
Note: * Lines PCS-PL-L049, L039, and L030 comprise a common makeup line from both sources.			