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Docket No.: 52-025

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ND-16-2168  
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 2.2.03.08b.02 [Index Number 176]

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 2.2.03.08b.02 [Index Number 176] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.2.03.08b.02 [Index Number 176]. 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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Completion Plan for Uncompleted ITAAC 2.2.03.08b.02 [Index Number 176]

MJY/kms/amm

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**Southern Nuclear Operating Company  
ND-16-2168  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion Plan for Uncompleted ITAAC 2.2.03.08b.02 [Index Number 176]**

**Subject: Uncompleted ITAAC 2.2.03.08b.02 [Index No. 176]**

### **ITAAC Statement**

#### **Design Commitment**

*8.b) The PXS provides core decay heat removal during design basis events.*

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

*2. Inspection of the elevation of the PRHR HX will be conducted.*

#### **Acceptance Criteria**

*2. The elevation of the centerline of the HX's upper channel head is greater than the HL centerline by at least 26.3 ft.*

### **ITAAC Completion Description**

Multiple ITAAC are performed to demonstrate that the Passive Core Cooling System (PXS) provides core decay heat removal during design basis events. The subject ITAAC requires that an inspection be conducted of the Passive Residual Heat Removal Heat Exchanger (PRHR HX) to confirm that the centerline elevation of the PRHR HX's upper channel head is greater than the Hot Leg (HL) centerline by at least 26.3 ft.

The inspection of the centerline elevation of the PRHR HX's upper channel head and the centerline elevation of the HL is performed, following installation of the PRHR HX and the main reactor coolant loop piping, using survey equipment in accordance with site survey and measurement procedures. The elevation difference is determined by measuring the centerline elevation of the HL and the centerline elevation of the PRHR HX's upper channel head in relation to a common reference point, and comparing the results.

The inspection results are documented in the Principal Closure Document XXX (Reference 1) supporting the ITAAC 2.2.03.08b.02 Completion Package (Reference 2) and determined that the centerline elevation of the PRHR HX's upper channel head is xxx.x feet and the Hot Leg (HL) centerline is yyy.y feet. The inspection results verify that the elevation of the centerline of the PRHR HX's upper channel head is xx.x feet greater than the HL centerline. This meets the ITAAC acceptance criteria of at least 26.3 ft. greater.

Principal Closure Document XXX is available for NRC inspection as part of the ITAAC 2.2.03.08b.02 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. Principal Closure Document XXX
2. ITAAC 2.2.03.08b.02 Completion Package
3. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"