

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 3 1 2016**

ND-16-2190  
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 2.1.02.12a.v [Index Number 57]

Ladies and Gentlemen:

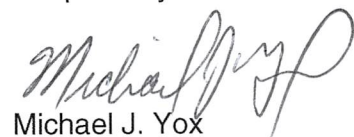
Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of October 14, 2016, Vogtle Electric Generating Plant (VEGP) Unit 3 Uncompleted Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) Item 2.1.02.12a.v [Index Number 57] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.1.02.12a.v [Index Number 57]. 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-16-2190

Page 2 of 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion Plan for Uncompleted ITAAC 2.1.02.12a.v [Index Number 57]

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. Ernstes

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-16-2190  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion Plan for Uncompleted ITAAC 2.1.02.12a.v [Index Number 57]**

**Subject: Uncompleted ITAAC 2.1.02.12a.v [Index No. 57]**

### **ITAAC Statement**

#### **Design Commitment**

*12.a) The automatic depressurization valves identified in Table 2.1.2-1 perform an active safety-related function to change position as indicated in the table.*

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

*v) Inspection will be performed for the existence of a report verifying that the as-built squib valves are bounded by the tests or type tests.*

#### **Acceptance Criteria**

*v) A report exists and concludes that the as-built squib valves are bounded by the tests or type tests.*

### **ITAAC Completion Description**

Multiple ITAAC are performed to demonstrate that the automatic depressurization valves identified in VEGP Unit 3 Combined License (COL) Appendix C Table 2.1.2-1 (Attachment A) perform an active safety-related function to change position as indicated in the table. The subject ITAAC requires that an inspection is performed for the existence of a report verifying that the as-built squib valves are bounded by tests or type tests.

The squib valves in VEGP Unit 3 COL Appendix C Table 2.1.2-1 are verified by the tests or type tests in accordance with ITAAC 2.1.02.12a.iv (Reference 1) to demonstrate the capability of the valves to operate under their design conditions. Equipment Qualification Data Packages (EQDP) and Equipment Qualification Summary Reports (EQSR) identify the equipment mounting employed for the testing and the specific conditions tested.

In accordance with Equipment Qualification (EQ) Walkdown Inspection Procedure XYZ (Reference 2) an inspection is conducted of the Reactor Coolant System (RCS) to confirm the satisfactory installation of the squib valves. The inspection includes verification of equipment make/model/serial number, verification of equipment mounting and location, and verification that the mechanical and electrical connections are bounded by the tested conditions.

The documentation of installed configuration of the squib valves includes photographs and/or sketches of equipment mounting and connections. The verification of installed component configuration is documented in the EQ As-Built Reconciliation Report(s) (Reference 3).

Attachment A identifies the EQ As-Built Reconciliation Report(s) which verify that the installed configuration of the squib valves identified in VEGP Unit 3 COL Appendix C Table 2.1.2-1 is

bounded by the tests or type tests. The EQ As-Built Reconciliation Report(s) are available for NRC inspection as part of the ITAAC Completion Package (Reference 4).

### **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 two (2) closed notices of nonconformance (NON) associated with this ITAAC:

1. 99900080/2013-201-02 – Failure to establish sufficient measures for the selection and review for suitability of application of parts that are essential to safety-related functions.
2. 99900080/2012-201-01 - Failure to verify the adequacy of the initiator assembly design as part of SPX's commercial-grade dedication program.

The ITAAC completion review determined that all corrective actions associated with the findings are complete and are closed. The NRC closure of these findings is documented in NRC Vendor Inspection Reports No. 99900080/2015-201 and 99900080/2015-202.

### **References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.1.02.12a.iv [Index No. 56]
2. EQ Walkdown Inspection Procedure XYZ
3. EQ As-Built Reconciliation Report(s) identified in Attachment A
4. ITAAC 2.1.02.12a.v Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Attachment A: Excerpt from COL Appendix C Table 2.1.2-1**

**SQUIB VALVES  
(REACTOR COOLANT SYSTEM)**

<b>Equipment Name</b>	<b>Tag No.</b>	<b>Active Function</b>	<b>EQ As-Built Reconciliation Report</b>
Fourth-stage ADS Squib Valve	RCS-PL-V004A	Transfer Open	XXX
Fourth-stage ADS Squib Valve	RCS-PL-V004B	Transfer Open	XXX
Fourth-stage ADS Squib Valve	RCS-PL-V004C	Transfer Open	XXX
Fourth-stage ADS Squib Valve	RCS-PL-V004D	Transfer Open	XXX