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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 3.6.00.01.iii [Index Number 836]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of October 31, 2016, Vogtle Electric Generating Plant (VEGP) Unit 3 Uncompleted Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) Item 3.6.00.01.iii [Index Number 836] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 3.6.00.01.iii [Index Number 836]. 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

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Completion Plan for Uncompleted ITAAC 3.6.00.01.iii [Index Number 836]

MJY/kms/amm

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**Southern Nuclear Operating Company  
ND-16-2351  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion Plan for Uncompleted ITAAC 3.6.00.01.iii [Index Number 836]**

**Subject: Uncompleted ITAAC 3.6.00.01.iii [Index No. 836]**

## **ITAAC Statement**

### **Design Commitment**

1. *The diverse leak detection methods provide the nonsafety-related function of detecting small leaks when RCS leakage indicates possible reactor coolant pressure boundary degradation.*

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

*See sections:*

- iii) *See ITAAC Table 2.1.2-4, Items 5.a), 7.a), and 10 for the pressurizer level measuring instruments RCS-195A, RCS-195B, RCS-195C, and RCS-195D.*

### **Acceptance Criteria**

*See sections:*

- iii) *See ITAAC Table 2.1.2-4, Items 5.a), 7.a), and 10 for the pressurizer level measuring instruments RCS-195A, RCS-195B, RCS-195C, and RCS-195D.*

## **ITAAC Completion Description**

This ITAAC's Design Commitment is met by reference to ITAAC Items 5a.i, 5a.ii, 5a.iii, 7a.i, 7a.ii, and 10 in VEGP Unit 3 Combined License (COL), Appendix C, Table 2.1.2-4 for the pressurizer level measuring instruments RCS-195A, RCS-195B, RCS-195C, and RCS-195D.

Item 5a.i verifies that the Seismic Category I equipment (RCS-195A, RCS-195B, RCS-195C, and RCS-195D) identified in VEGP Unit 3 COL, Appendix C, Table 2.1.2-1 is located on the Nuclear Island. Item 5a.ii verifies that a report exists and concludes that the seismic Category I equipment (RCS-195A, RCS-195B, RCS-195C, and RCS-195D) can withstand seismic design basis loads without loss of safety function. Item 5a.iii verifies that a report exists and concludes that the as-built equipment (RCS-195A, RCS-195B, RCS-195C, and RCS-195D) including anchorage is seismically bounded by the tested or analyzed conditions.

Item 7a.i verifies that a report exists and concludes that the Class 1E equipment (RCS-195A, RCS-195B, RCS-195C, and RCS-195D) identified in VEGP Unit 3 COL, Appendix C, Table 2.1.2-1 as being qualified for a harsh environment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of safety function for the time required to perform the safety function. Item 7a.ii verifies that a report exists and concludes that the as-built Class 1E equipment (RCS-195A, RCS-195B, RCS-195C, and RCS-195D) and the associated wiring, cables, and terminations identified in VEGP Unit 3

COL, Appendix C, Table 2.1.2-1 as being qualified for a harsh environment are bounded by type tests, analyses, or a combination of type tests and analyses.

Item 10 verifies that safety-related displays for the pressurizer level measuring instruments RCS-195A, RCS-195B, RCS-195C, and RCS-195D identified in VEGP Unit 3 COL, Appendix C, Table 2.1.2-1 can be retrieved in the Main Control Room.

The ITAAC Closure Notifications (References 1, 2, 3, 4, 5, and 6) summarize the methodology for conducting the Inspections/Tests/Analyses, and the results that demonstrate that the acceptance criteria are met. These closure notifications are submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination bases are referenced in the closure notifications for items 5a.i, 5a.ii, 5a.iii, 7a.i, 7a.ii, and 10 of VEGP Unit 3 COL, Appendix C, Table 2.1.2-4 and are available for NRC inspection as part of the ITAAC Completion Package (Reference 7).

### **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. ND-XX-XXXX, ITAAC Closure Notification on Completion of ITAAC 2.1.02.05a.i [Index No. 19]
2. ND-XX-XXXX, ITAAC Closure Notification on Completion of ITAAC 2.1.02.05a.ii [Index No. 20]
3. ND-XX-XXXX, ITAAC Closure Notification on Completion of ITAAC 2.1.02.05a.iii [Index No. 21]
4. ND-XX-XXXX, ITAAC Closure Notification on Completion of ITAAC 2.1.02.07a.i [Index No. 24]
5. ND-XX-XXXX, ITAAC Closure Notification on Completion of ITAAC 2.1.02.07a.ii [Index No. 25]
6. ND-XX-XXXX, ITAAC Closure Notification on Completion of ITAAC 2.1.02.10 [Index No. 45]
7. ITAAC 3.6.00.01.iii Completion Package
8. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"