

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



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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 E.3.9.07.01.03 [Index Number 867]

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 E.3.9.07.01.03 [Index Number 867] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC E.3.9.07.01.03 [Index Number 867]. 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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Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3
Completion Plan for Uncompleted ITAAC E.3.9.07.01.03 [Index Number 867]

MJY/kms/amm

To:

Southern Nuclear Operating Company/Georgia Power Company

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. 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

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cc:

Nuclear Regulatory Commission

Ms. C. Haney (w/o enclosures)

Ms. J. M. Heisserer

Mr. C. P. Patel

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

Mr. C. J. Even

Ms. V. L. Ordaz

Oglethorpe Power Corporation

Mr. K. T. Haynes

Mr. R. B. Brinkman

Municipal Electric Authority of Georgia

Mr. J. E. Fuller

Mr. S. M. Jackson

Dalton Utilities

Mr. T. Bundros

WECTEC

Mr. C. A. Castell

Westinghouse Electric Company, LLC

Mr. R. Easterling (w/o enclosures)

Mr. J. W. Crenshaw (w/o enclosures)

Mr. J. L. Woodcock (w/o enclosures)

Mr. C. F. Landon

Mr. M. Y. Shaqqo

Ms. S. DiTommaso

Mr. A. F. Dohse

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*

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**Southern Nuclear Operating Company
ND-16-2356
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3
Completion Plan for Uncompleted ITAAC E.3.9.07.01.03 [Index Number 867]**

Subject: Uncompleted ITAAC E.3.9.07.01.03 [Index No. 867]

ITAAC Statement

Design Commitment

- 7.1 *The means exists to warn and advise onsite individuals of an emergency, including those in areas controlled by the operator, including:*
- *Employees not having emergency assignments*
 - *Visitors*
 - *Contractor and construction personnel*
 - *Other persons who may be in the public access areas, on or passing through the site, or within the owner controlled area*
- [J.1]*

Inspections/Tests/Analyses

- 7.1 *A test of the onsite warning and communication capability emergency implementing procedures (EIPs) including protective action guidelines, assembly and accountability, and site dismissal will be performed during a drill.*

Acceptance Criteria

- 7.1.3 *Demonstrate the ability to prepare for around-the-clock staffing requirements.*

ITAAC Completion Description

Multiple ITAAC are performed to verify that a means exists to warn and advise the onsite individuals identified in VEGP Unit 3 Combined License (COL) Appendix C Table E.3.9-7, Index Number 867, of an emergency. The subject ITAAC requires that a test of the onsite warning and communication capability Emergency Implementing Procedures (EIPs) including protective action guidelines, assembly and accountability, and site dismissal is performed during a drill to demonstrate the ability to prepare for around-the-clock staffing requirements.

The test, in the form of an emergency plan drill, is developed in accordance with NMP-EP-303, Drill and Exercise Standards, (Reference 1). The emergency plan drill scenario is of sufficient severity to demonstrate the ability to prepare for around-the-clock staffing requirements by testing onsite warning and communication capability EIPs including protective action guidelines, assembly and accountability, and site dismissal performance during the drill.

NMP-EP-303-F01, Drill/Exercise Critique, (Reference 2) is used to critique the emergency plan drill. The Drill/Exercise Critique concludes that the ability to prepare for around-the-clock staffing requirements is met by testing the onsite warning and communication capability EIPs including protective action guidelines, assembly and accountability, and site dismissal performance during a drill.

The NMP-EP-303-F01, Drill/Exercise Critique, is available for NRC inspection as part of the ITAAC Completion Package (Reference 3).

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. NMP-EP-303, Drill and Exercise Standards
2. NMP-EP-303-F01, Drill/Exercise Critique
3. ITAAC E.3.9.07.01.03 Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"