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Docket No.: 52-026

**DEC 29 2016**

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555-0001

ND-16-2812  
10 CFR 52.99(c)(1)

Southern Nuclear Operating Company  
Vogtle Electric Generating Plant Unit 4  
ITAAC Closure Notification on Completion of ITAAC 2.1.01.07.ii [Index Number 9]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 4 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.1.01.07.ii [Index Number 9] which verifies that an inspection was performed and concludes that the seismic Category I components identified in VEGP Unit 4 Combined License (COL) Appendix C, Table 2.1.1-2 are located on the Nuclear Island. The closure process for this ITAAC is based on 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.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact David Woods at 706-848-6903.

Respectfully submitted,

  
Michael J. Yox  
Regulatory Affairs Director Vogtle 3&4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4  
Completion of ITAAC 2.1.01.07.ii [Index Number 9]

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File AR.01.02.06

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U.S. Nuclear Regulatory Commission  
ND-16-2812 Enclosure  
Page 3 of 3

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**Southern Nuclear Operating Company  
ND-16-2812  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 4  
Completion of ITAAC 2.1.01.07.ii [Index Number 9]**

## **ITAAC Statement**

### **Design Commitment:**

7. The new and spent fuel storage racks maintain the effective neutron multiplication factor required by 10 CFR 50.68 limits during normal operation, design basis seismic events, and design basis dropped spent fuel assembly accidents over the spent fuel storage racks.

### **Inspections, Tests, Analysis:**

- ii) Inspection will be performed to verify that the new and spent fuel storage racks are located on the nuclear island.

### **Acceptance Criteria:**

- ii) The new and spent fuel storage racks are located on the nuclear island.

## **ITAAC Determination Basis**

Multiple ITAAC are performed to demonstrate that the new and spent fuel storage racks (identified in Vogtle Electric Generating Plant (VEGP) Unit 4 Combined License (COL) Appendix C, Table 2.1.1-2) can maintain the effective neutron multiplication factor required by 10 CFR 50.68 limits during normal operation, design basis seismic events, and design basis dropped spent fuel assembly accidents over the spent fuel storage racks.

This ITAAC requires an inspection be performed to verify that the new and spent fuel storage racks are located on the Nuclear Island. The Nuclear Island is a Seismic Category I structure encompassing the Auxiliary Building where the new and spent fuel storage racks are located, as illustrated by the drawings referenced in the enclosed Attachment A. Completion of this ITAAC confirms the new and spent fuel storage racks are located on the nuclear island and, as such, can maintain the effective neutron multiplication factor required by 10 CFR 50.68 limits during normal operation, design basis seismic events, and design basis dropped spent fuel assembly accidents over the spent fuel storage racks.

The Fuel handling System (FHS) general arrangement drawing SV4-FHS-V2-001 (Reference 3, which has been issued for construction), for the new and spent fuel storage racks were visually inspected and the new and spent fuel storage racks listed in Attachment A were verified to be located on the nuclear island per design. The locations of the new and spent fuel storage racks as shown on the FHS general arrangement drawing was compared to the Nuclear Island General Arrangement Operating Deck El. 135'-3" drawing, SV4-1050-P2-001 (Reference 4), and were verified to be located within the bounds of the column lines shown on the Nuclear Island General Arrangement drawing, thereby confirming that the new and spent fuel storage racks in Attachment A are located on the Nuclear Island. The results of the inspection are documented in the Inspection Report (Reference 1).

### **ITAAC Finding Review**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all ITAAC findings pertaining to the subject ITAAC and associated corrective actions. This review found that there are no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review document number is included in the Vogtle Unit 4 ITAAC Completion Package for ITAAC 2.1.01.07.ii (Reference 2) and available for NRC inspection.

### **ITAAC Completion Statement**

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.1.01.07.ii was performed for VEGP Unit 4 and that the prescribed acceptance criteria are met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

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

1. SV4-FHS-ITR-002, Revision 0, "Inspection Report Confirming the New and Spent Fuel Storage Racks are Located on the Nuclear Island, ITAAC 2.1.01.07.ii"
2. SVP\_SV0\_004445, Attachment 1, "Submittal of Inspections, Test, Analyses and Acceptance Criteria (ITAAC) Completion Package for Unit 4 ITAAC 2.1.01.07.ii [Index Number 9] (Fuel Storage Racks K-Effective Location)"
3. SV4-FHS-V2-001, Revision 0, "Fuel Handling System General Arrangement Auxiliary Building & Containment Operating Deck Elevation 135'-3'"
4. SV4-1050-P2-001, Revision 0, "Nuclear Island General Arrangement Operating Deck El. 135'-3'"

**Attachment A**

**Fuel Handling and Refueling System (FHS)**

Excerpted from COL Appendix C Table 2.1.1-2\*

<b>Component Name*</b>	<b>Tag No.*</b>	<b>Component Location*</b>	<b>Isometric Drawing</b>	<b>General Arrangement Drawing</b>
Spent Fuel Storage Racks*	FHS-FS-02*	Auxiliary Building*	SV4-FHS-V2-001 (Reference 3)	SV4-1050-P2-001 (Reference 4)
New Fuel Storage Racks*	FHS-FS-01*	Auxiliary Building*	SV4-FHS-V2-001 (Reference 3)	SV4-1050-P2-001 (Reference 4)