



Michael J. Yox  
Regulatory Affairs Director  
Vogtle 3 & 4

7825 River Road  
Waynesboro, GA 30830  
706-848-6459 tel  
410-474-8587 cell  
myox@southernco.com

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52-026

ND-17-2138  
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 and Unit 4  
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load  
Item 2.3.11.01 [Index Number 449]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of December 28, 2017, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.3.11.01 [Index Number 449] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing this ITAAC. 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.

Southern Nuclear Operating Company (SNC) previously submitted, via letter ND-16-2084 [ML16300A130], a Unit 3 Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load for Item 2.3.11.01 [Index Number 449]. This resubmittal supersedes the previous Unit 3 notice in its entirety.

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 Tom Petrak at 706-848-1575.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael J. Yox". The signature is fluid and cursive, with the first name "Michael" written in a larger, more prominent script than the last name "Yox".

Michael J. Yox  
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.3.11.01 [Index Number 449]

MJY/RAS/amw

**To:**

**Southern Nuclear Operating Company / Georgia Power Company**

Mr. D. A. Bost (w/o enclosures)  
Mr. M. D. Rauckhorst (w/o enclosures)  
Mr. M. D. Meier  
Mr. D. H. Jones (w/o enclosures)  
Mr. D. L. McKinney  
Mr. M. J. Yox  
Mr. D. L. Fulton  
Mr. J. D. Williams  
Mr. F. H. Willis  
Ms. A. L. Pugh  
Mr. A. S. Parton  
Mr. W. A. Sparkman  
Mr. C. E. Morrow  
Ms. K. M. Stacy  
Mr. M. K. Washington  
Mr. J. P. Redd  
Ms. A. C. Chamberlain  
Mr. D. R. Culver  
Mr. R. L. Beilke  
Mr. T. G. Petrak  
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**cc:**

**Nuclear Regulatory Commission**

Mr. W. Jones (w/o enclosures)  
Ms. J. M. Heisserer  
Mr. C. P. Patel  
Mr. M. E. Ernstes  
Mr. G. J. Khouri  
Mr. T. E. Chandler  
Ms. S. E. Temple  
Ms. P. Braxton  
Mr. T. C. Brimfield  
Mr. A. J. Lerch  
Mr. C. J. Even  
Mr. F. D. Brown  
Mr. B. J. Kemker  
Ms. A. E. Rivera-Varona

**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

**Westinghouse Electric Company, LLC**

Dr. L. Oriani (w/o enclosures)

Mr. D. C. Durham (w/o enclosures)

Mr. M. M. Corletti

Ms. L. G. Iller

Mr. D. Hawkins

Ms. S. DiTommaso

Mr. J. L. Coward

Ms. N. E. Deangelis

**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-17-2138  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Docket No: 52-025 & 52-026**

**Completion Plan for Uncompleted ITAAC 2.3.11.01 [Index Number 449]**

## **ITAAC Statement**

### **Design Commitment**

1. The functional arrangement of the WGS is as described in the Design Description of this Section 2.3.11.

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

Inspection of the as-built system will be performed.

### **Acceptance Criteria**

The as-built WGS conforms with the functional arrangement as described in the Design Description of this Section 2.3.11.

## **ITAAC Completion Description**

An inspection of the as-built Gaseous Radwaste System (WGS) is conducted after completion of construction to confirm that the functional arrangement of the WGS is as described in the Design Description of Combined License (COL) Appendix C, Section 2.3.11. This inspection encompasses the structures, systems, and components (SSCs) identified in the COL Appendix C, Section 2.3.11, Design Description, including those in Table 2.3.11-3, and Figure 2.3.11-1.

The inspection (walkdown) is completed in accordance with APP-GW-ITY-004, Functional Arrangement ITAAC Guideline (Reference 1), which requires the preparation of a detailed inspection plan. This inspection plan includes the use of detailed drawings such as Piping and Instrumentation Drawings (P&IDs) or Single Line Elementary Drawings to perform visual observations and compare the as-built system to the Design Description.

The inspection results are documented in the Unit 3 and Unit 4 Principal Closure Documents XXX and YYY (References 2 and 3, respectively) supporting the Unit 3 and Unit 4 ITAAC 2.3.11.01 Completion Package (References 4 and 5, respectively) and verify that the SSCs are physically arranged and located to perform the functions described in the Design Description and referenced figures and tables. The inspection results confirm that the as-built WGS conforms with the functional arrangement as described in the COL Appendix C, Section 2.3.11, Design Description.

The Unit 3 and Unit 4 Principal Closure Documents XXX and YYY are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.3.11.01 Completion Packages.

## **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. APP-GW-ITY-004, Functional Arrangement Guideline
2. Principal Closure Document XXX (Unit 3)
3. Principal Closure Document YYY (Unit 4)
4. ITAAC 2.3.11.01 Completion Package (Unit 3)
5. ITAAC 2.3.11.01 Completion Package (Unit 4)
6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"