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10 CFR 52.99(c)(1)U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555-0001Southern Nuclear Operating Company  
Vogtle Electric Generating Plant Unit 4  
ITAAC Closure Notification on Completion of ITAAC 2.2.04.08a.i [Index Number 235]

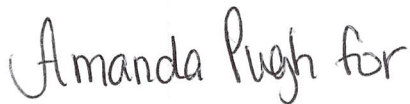
Ladies and Gentlemen:

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 2.2.04.08a.i [Index Number 235] for verifying that the sum of the rated capacities recorded on the valve vendor code plates of the steam generator safety valves exceeds 8,240,000 lb/hr per steam generator. 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 Tom Petrak at 706-848-1575.

Respectfully submitted,

Michael J. Yox  
Regulatory Affairs Director Vogtle 3&4Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4  
Completion of ITAAC 2.2.04.08a.i [Index Number 235]

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**Southern Nuclear Operating Company  
ND-18-0114  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 4  
Completion of ITAAC 2.2.04.08a.i [Index Number 235]**

### **ITAAC Statement**

#### **Design Commitment:**

8.a) The SGS provides a heat sink for the RCS and provides overpressure protection in accordance with Section III of the ASME Boiler and Pressure Vessel Code.

#### **Inspections, Tests, Analyses:**

i) Inspections will be conducted to confirm that the value of the vendor code plate rating of the steam generator safety valves is greater than or equal to system relief requirements.

#### **Acceptance Criteria:**

i) The sum of the rated capacities recorded on the valve vendor code plates of the steam generator safety valves exceeds 8,240,000 lb/hr per steam generator.

### **ITAAC Determination Basis**

Multiple inspections, tests and analysis (ITAAC) are performed to verify that the Steam Generator System (SGS) provides a heat sink for the Reactor Coolant System (RCS) and provides overpressure protection in accordance with Section III of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code. This ITAAC requires an inspection to confirm that the sum of the rated capacities recorded on the valve vendor code plates of the steam generator safety valves exceeds 8,240,000 lb/hr per steam generator.

An inspection of the ASME Code Data for the steam generator safety valves listed in the Combined License (COL) Appendix C, Table 2.2.4-1 (Attachment A) was performed (Reference 2).

The rated capacities recorded on the ASME NV-2 Code plates of the safety valves were summed and exceed 8,240,000 lb/hr per set of valves for each steam generator. The steam generator safety valve flow capacity recorded on the valve ASME Code plate was certified by ASME through the National Board of Boiler and Pressure Vessel Inspectors (NBBPVI). Article NC-7700 of the ASME Boiler and Pressure Vessel Code, Section III (Reference 1) describes the methods required to certify the relief device capacity and determine a coefficient used in determining capacity in subsequently manufactured valves. The safety valve flow capacity for the steam generator safety valves was calculated by a set of equations using the coefficient found in NC-7700 and also in NB-18, "Pressure Relief Device Certification" from the NBBPVI.

The ASME Code data plate for each steam generator safety valve records the rated capacity based on the set pressures as shown in Attachment A. The sum of the rated capacities recorded on the valve vendor code plates of the steam generator safety valves is 10,937,764 lb/hr for each steam generator which exceeds 8,240,000 lb/hr per steam generator and meets the ITAAC acceptance criteria.

### **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 is included in the Vogtle Unit 4 ITAAC Completion Package for ITAAC 2.2.04.08a.i (Reference 3) and available for NRC inspection.

### **ITAAC Completion Statement**

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.2.04.08a.i was performed for VEGP Unit 4 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. American Society of Mechanical Engineers Boiler & Pressure Vessel Code, Section III, 1998 Edition with 2000 Addenda
2. SV4-PV65-VQQ-001 Rev 1, "Quality Release and Certificate of Conformance for PV65 MSSV's"
3. 2.2.04.08a.i-U4-CP-Rev 0, Completion Package for Unit 4 ITAAC 2.2.04.08a.i [COL Index 235] (SGS Safety Valves Code Plate Rating)

### Attachment A

#### Steam Generator System Steam Safety Valves

*Equipment Name	*Tag No.	Serial No.	Quality Release and Certificate of Conformance	Code Plate Rated Capacity (lb/hr)	Set Pressure (psig)
Main Steam Safety Valve SG01	SGS-PL-V030A	JX-16-CN0023 JX-16-CN0029	SV4-PV65-VQQ-001	1,781,854	1185
Main Steam Safety Valve SG02	SGS-PL-V030B				
Main Steam Safety Valve SG01	SGS-PL-V031A	JX-16-CN0024 JX-16-CN0030	SV4-PV65-VQQ-001	1,799,683	1197
Main Steam Safety Valve SG02	SGS-PL-V031B				
Main Steam Safety Valve SG01	SGS-PL-V032A	JX-16-CN0025 JX-16-CN0031	SV4-PV65-VQQ-001	1,817,513	1209
Main Steam Safety Valve SG02	SGS-PL-V032B				
Main Steam Safety Valve SG01	SGS-PL-V033A	JX-16-CN0026 JX-16-CN0032	SV4-PV65-VQQ-001	1,835,342	1221
Main Steam Safety Valve SG02	SGS-PL-V033B				
Main Steam Safety Valve SG01	SGS-PL-V034A	JX-16-CN0027 JX-16-CN0028 JX-16-CN0033 JX-16-CN0034	SV4-PV65-VQQ-001	1,851,686 <sup>1</sup>	1232
Main Steam Safety Valve SG02	SGS-PL-V034B				
Main Steam Safety Valve SG01	SGS-PL-V035A				
Main Steam Safety Valve SG02	SGS-PL-V035B				
Sum of rated capacities of the safety valves for each steam generator				10,937,764	

1 – Sum includes code plate capacity times 2

\*Excerpt from COL Appendix C Table 2.2.4-1