



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

Docket Nos.: 52-025
52-026

ND-18-0092
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 2.2.05.01 [Index Number 252]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of January 25, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.05.01 [Index Number 252] 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-16-1981 [ML16300A257], a Unit 3 Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load for Item 2.2.05.01 [Index Number 252]. 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,

Michael J. Yox
Regulatory Affairs Director Vogtle 3 & 4

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Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.2.05.01 [Index Number 252]

MJY/LBP/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

Document Services RTYPE: VND.LI.L06

File AR.01.02.06

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. 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-18-0092
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.2.05.01 [Index Number 252]**

ITAAC Statement

Design Commitment

1. The functional arrangement of the VES is as described in the Design Description of this Section 2.2.5.

Inspections/Tests/Analyses

Inspection of the as-built system will be performed.

Acceptance Criteria

The as-built VES conforms with the functional arrangement described in the Design Description of this Section 2.2.5.

ITAAC Completion Description

An inspection of the as-built Main Control Room Emergency Habitability System (VES) is conducted after completion of construction to confirm that the functional arrangement of the VES is as described in the Design Description of Combined License (COL) Appendix C Section 2.2.5. This inspection encompasses the structures, systems, and components (SSCs) identified in the COL Appendix C Section 2.2.5, Design Description, including Figure 2.2.5-1 and Table 2.2.5-6.

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 2.2.05.01 Completion Packages (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 figure and table. The inspection results confirm that the as-built VES conforms with the functional arrangement as described in the COL Appendix C Section 2.2.5, Design Description.

The Unit 3 and Unit 4 Principal Closure Documents XXX and YYY are available for NRC inspection as part of the ITAAC 2.2.05.01 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 ITAAC Guideline
2. Principal Closure Document XXX (Unit 3)
3. Principal Closure Document YYY (Unit 4)
4. ITAAC 2.2.05.01 Completion Package (Unit 3)
5. ITAAC 2.2.05.01 Completion Package (Unit 4)
6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"