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FEB 02 2018

Docket No.: 52-025
52-026

ND-18-0100
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 2.6.05.03.i [Index Number 630]

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 2.6.05.03.i [Index Number 630] 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.

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

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.6.05.03.i [Index Number 630]

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Document Services RTYPE: VND.LI.L06

File AR.01.02.06

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**Southern Nuclear Operating Company
ND-18-0100
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.6.05.03.i [Index Number 630]**

ITAAC Statement

Design Commitment:

3. The lighting fixtures located in the MCR utilize seismic supports.

Inspections, Tests, Analyses:

i) Inspection will be performed to verify that the lighting fixtures located in the MCR are located on the Nuclear Island.

ii) Analysis of seismic supports will be performed.

Acceptance Criteria:

i) The lighting fixtures located in the MCR are located on the Nuclear Island.

ii) A report exists and concludes that the seismic supports can withstand seismic design basis loads.

ITAAC Completion Description

Following installation of the Main Control Room (MCR) lighting fixtures, an inspection is performed to verify the lighting fixtures are located on the Nuclear Island. Additionally, an analysis of the lighting fixture supports is performed and a report exists that concludes the lighting fixture seismic supports can withstand seismic design basis loads.

The inspection of the MCR lighting fixtures is performed in accordance with Nuclear Quality Site Instruction QSI 10.1-V (Reference 1) to confirm the lighting fixtures are located on the Nuclear Island. Detailed design drawings are used to confirm the satisfactory installation of the MCR lighting fixtures. The inspection includes verification of each lighting fixture location and the support configuration. The results of the inspection are documented in reports for Unit 3 and Unit 4 (References 2 and 3, respectively). The reports conclude the lighting fixtures are located on the Nuclear Island.

An analysis of the lighting fixture seismic supports is performed to confirm the supports can withstand seismic design basis loads. The MCR lighting fixture supports are designed as Seismic Category I Equipment. The supports consist of steel unistrut channels welded to the ceiling of the MCR and steel chains that attach the light fixture to the unistrut channels. The seismic loading conditions are established using the AP1000 seismic floor response spectra and the equivalent static load method of analysis described in the Vogtle 3&4 Updated Final Safety Analysis Report (UFSAR) (Reference 4). Lateral loads acting on the support chains are considered negligible based on guidance from the American Society of Civil Engineers (ASCE) Standard 7-05 (Reference 5). Structural integrity is demonstrated by calculating and concluding the maximum seismic loads are less than or equal to the applicable design code allowable limits. The results of the analysis are documented in APP-SH25-S3C-002 (Reference 6) and conclude the lighting fixture seismic supports can withstand seismic design basis loads.

The inspection report and analysis are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.6.05.03.i Completion Packages (References 7 and 8, respectively).

List of ITAAC Findings

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of ITAAC Findings pertaining to the subject ITAAC and associated corrective actions. This finding review, which includes now-consolidated ITAAC Index 631, found no relevant ITAAC findings associated with this ITAAC.

References (available for NRC inspection)

1. Nuclear Quality Site Instruction QSI 10.1-V, Rev. 011, "Inspection Planning and Reporting"
2. Unit 3 Main Control Room Lighting Inspection Report, IR-XXXXXX
3. Unit 4 Main Control Room Lighting Inspection Report, IR-YYYYY
4. Vogtle 3&4 UFSAR, Subsection 3.7.3.5
5. ASCE, "Minimum Design Loads for Buildings and Other Structures, American Society of Civil Engineers"
6. APP-SH25-S3C-002, Rev. 3, "AP1000 Seismic Category 1 Standard Conduit Supports"
7. ITAAC 2.6.05.03.i Unit 3 Completion Package
8. ITAAC 2.6.05.03.i Unit 4 Completion Package
9. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"