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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 2.2.01.02a [Index Number 91]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of February 12, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.01.02a [Index Number 91] 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

U.S. Nuclear Regulatory Commission

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Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.2.01.02a [Index Number 91]

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**Southern Nuclear Operating Company
ND-18-0179
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.2.01.02a [Index Number 91]**

ITAAC Statement

Design Commitment:

2.a) The components identified in Table 2.2.1-1 as ASME Code Section III are designed and constructed in accordance with ASME Code Section III requirements.

2.b) The piping identified in Table 2.2.1-2 as ASME Code Section III is designed and constructed in accordance with ASME Code Section III requirements.

3.a) Pressure boundary welds in components identified in Table 2.2.1-1 as ASME Code Section III meet ASME Code Section III requirements.

3.b) Pressure boundary welds in piping identified in Table 2.2.1-2 as ASME Code Section III meet ASME Code Section III requirements.

4.a) The components identified in Table 2.2.1-1 as ASME Code Section III retain their pressure boundary integrity at their design pressure.

4.b) The piping identified in Table 2.2.1-2 as ASME Code Section III retains its pressure boundary integrity at its design pressure.

Inspections, Tests, Analyses:

Inspection will be conducted of the as-built components and piping as documented in the ASME design reports.

Inspection of the as-built pressure boundary welds will be performed in accordance with the ASME Code Section III.

i) A hydrostatic or pressure test will be performed on the components required by the ASME Code Section III to be tested.

A hydrostatic or pressure test will be performed on the piping required by the ASME Code Section III to be pressure tested.

Acceptance Criteria:

The ASME Code Section III design reports exist for the as-built components and piping identified in Tables 2.2.1-1 and 2.2.1-2 as ASME Code Section III.

A report exists and concludes that the ASME Code Section III requirements are met for non-destructive examination of pressure boundary welds.

i) A report exists and concludes that the results of the pressure test of the components identified in Tables 2.2.1-1 as ASME Code Section III conform with the requirements of the ASME Code Section III.

A report exists and concludes that the results of the pressure test of the piping identified in Table 2.2.1-2 as ASME Code Section III conform with the requirements of the ASME Code Section III.

ITAAC Completion Description

This ITAAC requires inspections, tests, and analyses be performed and documented to ensure the Containment System (CNS) components and piping listed in the Combined License (COL) Appendix C, Table 2.2.1-1 (Attachment A) and Table 2.2.1-2 (Attachment B) that are identified as American Society of Mechanical Engineers (ASME) Code Section III are designed and constructed in accordance with applicable requirements.

2.a) and 2.b) The ASME Code Section III design reports exist for the as-built components and piping identified in Tables 2.2.1-1 and 2.2.1-2 as ASME Code Section III.

Each component listed in Table 2.2.1-1 as ASME Code Section III is fabricated in accordance with the VEGP Updated Final Safety Analysis Report (UFSAR) and the ASME Code Section III requirements. The ASME Code Section III certified Design Reports for these components exist and document that the as-built components conform to the approved design details. The ASME Section III Design Report for each component is documented in the component's completed ASME Section III Code Data Report. The individual component ASME Section III Code Data Reports are documented on the ASME Section III N-5 Code Data Report(s) for the applicable piping system (Reference 1).

The as-built piping listed in Table 2.2.1-2 including the components listed in Table 2.2.1-1 as ASME Code Section III, are subjected to a reconciliation process (Reference 2), which verifies that the as-built piping are analyzed for applicable loads (e.g. stress reports) and for compliance with all design specification and Code provisions. Design reconciliation of the as-built systems, including installed components, validates that construction completion, including field changes and any nonconforming condition dispositions, is consistent with and bounded by the approved design. All applicable fabrication, installation and testing records, as well as, those for the related Quality Assurance (QA) verification/inspection activities, which confirm adequate construction in compliance with the ASME Code Section III and design provisions, are referenced in the N-5 data report and/or its sub-tier references.

The applicable ASME Section III N-5 Code Data Report(s), which include the location of the certified Design Reports for all the components listed in Table 2.2.1-1 (Attachment A) and piping listed in Table 2.2.1-2 (Attachment B) as ASME Code Section III, exist and conclude that these installed components are designed and constructed (including their installation within the applicable as-built piping system) in accordance with the ASME Code (1998 Edition, 2000 Addenda and 1989 Edition, 1989 Addenda), Section III requirements as applicable, as described in UFSAR subsection 5.2.1 (Reference 3). The N-5 Code Data Reports for the piping system(s) containing the components listed in Table 2.2.1-1 and Table 2.2.1-2 are identified in Attachments A and B, respectively.

3.a) and 3.b) A report exists and concludes that the ASME Code Section III requirements are met for non-destructive examination of pressure boundary welds.

Inspections are performed in accordance with ASME Code Section III (1998 Edition, 2000 Addenda) to demonstrate that as-built pressure boundary welds in components identified in

Table 2.2.1-1 as ASME Code Section III meet ASME Code Section III requirements (i.e., no unacceptable indications).

The applicable non-destructive examinations (including liquid penetrant, magnetic particle, radiographic, and ultrasonic testing, as required by ASME Code Section III) of the components' pressure boundary welds are documented in the Non-destructive Examination Report(s), which support completion of the respective ASME Section III N-5 Code Data Report(s) certified by the Authorized Nuclear Inspector, as listed in Attachment A.

Per ASME Code Section III, Subarticle NCA-8300, "Code Symbol Stamps," the N-5 Code Data Report(s) (Reference 1) documents satisfactory completion of the required examination and testing of the item, which includes non-destructive examinations of pressure boundary welds. Satisfactory completion of the non-destructive examination of pressure boundary welds ensures that the pressure boundary welds in components identified in Table 2.2.1-1 as ASME Code Section III meet ASME Code Section III requirements.

An inspection is performed in accordance with Reference 2 to demonstrate that the as-built pressure boundary welds in piping identified in Table 2.2.1-2 (Attachment B) as ASME Code Section III meet ASME Code Section III requirements (i.e., no unacceptable indications). This portion of the ITAAC is complete when the piping identified in Table 2.2.1-2, which is encompassed within the respective piping system Code Symbol N-Stamp and the corresponding piping system Code N-5 Data Report Form(s) (Reference 1), is complete. The non-destructive examinations (including visual inspection, liquid penetrant, magnetic particle, radiographic, and ultrasonic testing, as required by ASME Code Section III) of the piping pressure boundary welds are documented in the Non-destructive Examination Report(s) within the piping system's supporting data package, which support completion of the respective Code Stamping and Code N-5 Data Report(s). The completion of stamping the respective piping system along with the corresponding ASME Code N-5 Data Report Form(s) (certified by the Authorized Nuclear Inspector) ensure that the piping is constructed in accordance with the design specification(s) and the ASME Code Section III and that the satisfactory completion of the non-destructive examinations of piping pressure boundary welds for the pipe lines identified in Table 2.2.1-2 meet ASME Code Section III requirements and are documented in the Non-destructive Examination Report(s) within the supporting data packages.

4.a.i) and 4.b) A report exists and concludes that the results of the pressure test of the components and piping identified in Tables 2.2.1-1 and 2.2.1-2 as ASME Code Section III conform with the requirements of the ASME Code Section III.

A hydrostatic/pressure test is performed by the vendor to demonstrate that the components identified in Table 2.2.1-1 (Attachment A) as ASME Code Section III retain their pressure boundary integrity at their design pressure. The completion of the N-5 Data Reports is governed by Reference 2.

This portion of the ITAAC is complete once each component identified in Table 2.2.1-1 has their individual Code Symbol N-Stamp and corresponding Code Data Report (Reference 1) completed, and the components are installed into the respective Code Symbol N-Stamped piping system and documented on the corresponding N-5 Code Data Report(s) (Reference 1). The hydrostatic/pressure testing results of the component's pressure boundary are documented in the

Hydrostatic/Pressure Testing Report(s) within the supporting component's data package, which support completion of the respective Code Stamping and Code Data Report(s).

The completion of stamping the individual components and the respective piping system along with the corresponding ASME Code Data Reports (certified by the Authorized Nuclear Inspector) ensures that the components are constructed in accordance with the Design Specifications and the ASME Code Section III and that the satisfactory completion of the hydrostatic/pressure testing of each component identified in Table 2.2.1-1 as ASME Code Section III are documented in the Hydrostatic/Pressure Testing Report(s) within the supporting data packages and meets ASME Code Section III requirements.

This ITAAC also verifies that the piping identified in Table 2.2.1-2 (Attachment B) fully meets all applicable ASME Code Section III requirements and retains its pressure boundary integrity at its design pressure.

A hydrostatic/pressure test is performed in accordance with procedure XYZ (as applicable) that complies with the ASME Code (1998 Edition, 2000 Addenda), Section III requirements to demonstrate that the ASME Code Section III piping identified in Table 2.2.1-2 retains its pressure boundary integrity at its design pressure.

A hydrostatic/pressure test verifies that there are no leaks at welds or piping, and that the pressure boundary integrity is retained at its design pressure. The hydrostatic/pressure testing results of the pipe lines are documented in the Hydrostatic/Pressure Testing Report(s). The Hydrostatic/Pressure Testing Report(s) supports completion of the ASME Section III N-5 Code Data Report(s) for the applicable piping system (i.e., CNS) (Reference 1).

The applicable ASME Section III N-5 Code Data Report(s) (Reference 1) identified in Attachments A and B documents that the results of the hydrostatic/pressure testing of the components and piping identified in Table 2.2.1-1 and Table 2.2.1-2 respectively conform with the requirements of the ASME Code (1998 Edition, 2000 Addenda), Section III.

Reference 1 provides the evidence that the ITAAC Acceptance Criteria requirements are met:

- The ASME Code Section III design reports exist for the as-built components and piping identified in Tables 2.2.1-1 and 2.2.1-2 as ASME Code Section III;
- A report exists and concludes that the ASME Code Section III requirements are met for non-destructive examination of pressure boundary welds;
- A report exists and concludes that the results of the pressure test of the components identified in Table 2.2.1-1 as ASME Code Section III conform with the requirements of the ASME Code Section III, and
- A report exists and concludes that the results of the pressure test of the piping identified Table 2.2.1-2 as ASME Code Section III conform with the requirements of the ASME Code Section III.

Reference 1 is available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.2.01.02a Completion Packages (References 4 and 5, respectively).

List of ITAAC Findings

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all ITAAC findings and associated corrective actions. This review, which included now consolidated ITAAC Indexes 92, 93, 94, 95 and 97 found no relevant ITAAC findings associated with this ITAAC:

References (available for NRC inspection)

1. ASME N-5 Code Data Report(s)
2. APP-GW-GAP-139, "Westinghouse/WECTEC ASME N-5 Interface Procedure"
3. VEGP 3&4 Updated Final Safety Analysis Report, Subsection 5.2.1, Compliance with Codes and Code Cases
4. Completion Package for Unit 3 ITAAC 2.2.01.02a [COL Index Number 91]
5. Completion Package for Unit 4 ITAAC 2.2.01.02a [COL Index Number 91]
6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A

SYSTEM: Containment System (CNS)

Equipment Name *	Tag No. *	ASME Code Section III *	N-5 Report
Service Air Supply Outside Containment Isolation Valve	CAS-PL-V204	Yes	N-5 Code Data Report
Service Air Supply Inside Containment Isolation Check Valve	CAS-PL-V205	Yes	
Instrument Air Supply Outside Containment Isolation Valve	CAS-PL-V014	Yes	N-5 Code Data Report
Instrument Air Supply Inside Containment Isolation Check Valve	CAS-PL-V015	Yes	
Component Cooling Water System (CCS) Containment Isolation Motor-operated Valve (MOV) – Inlet Line Outside Reactor Containment (ORC)	CCS-PL-V200	Yes	N-5 Code Data Report
CCS Containment Isolation Check Valve – Inlet Line Inside Reactor Containment (IRC)	CCS-PL-V201	Yes	
CCS Containment Isolation MOV – Outlet Line IRC	CCS-PL-V207	Yes	N-5 Code Data Report
CCS Containment Isolation MOV – Outlet Line ORC	CCS-PL-V208	Yes	
CCS Containment Isolation Relief Valve – Outlet Line IRC	CCS-PL-V220	Yes	
Demineralized Water Supply Containment Isolation Valve ORC	DWS-PL-V244	Yes	N-5 Code Data Report
Demineralized Water Supply Containment Isolation Check Valve IRC	DWS-PL-V245	Yes	
Fuel Transfer Tube	FHS-FT-01	Yes	N-5 Code Data Report
Fuel Transfer Tube Isolation Valve	FHS-PL-V001	Yes	N-5 Code Data Report
Fire Water Containment Supply Isolation Valve – Outside	FPS-PL-V050	Yes	N-5 Code Data Report
Fire Water Containment Isolation Supply Check Valve – Inside	FPS-PL-V052	Yes	
Spent Fuel Pool Cooling System (SFS) Discharge Line Containment Isolation Check Valve – IRC	SFS-PL-V037	Yes	N-5 Code Data Report
SFS Discharge Line Containment Isolation MOV – ORC	SFS-PL-V038	Yes	
SFS Suction Line Containment Isolation MOV – IRC	SFS-PL-V034	Yes	N-5 Code Data Report
SFS Suction Line Containment Isolation MOV – ORC	SFS-PL-V035	Yes	
SFS Suction Line Containment Isolation Relief Valve – IRC	SFS-PL-V067	Yes	

Attachment A

SYSTEM: Containment System (CNS)

Equipment Name *	Tag No. *	ASME Code Section III *	N-5 Report
Containment Purge Inlet Containment Isolation Valve – ORC	VFS-PL-V003	Yes	N-5 Code Data Report
Containment Purge Inlet Containment Isolation Valve – IRC	VFS-PL-V004	Yes	
Integrated Leak Rate Testing Vent Discharge Containment Isolation Valve – ORC	VFS-PL-V008	Yes	N-5 Code Data Report
Containment Purge Discharge Containment Isolation Valve – IRC	VFS-PL-V009	Yes	
Containment Purge Discharge Containment Isolation Valve – ORC	VFS-PL-V010	Yes	
Vacuum Relief Containment Isolation A MOV – ORC	VFS-PL-V800A	Yes	N-5 Code Data Report
Vacuum Relief Containment Isolation B MOV – ORC	VFS-PL-V800B	Yes	
Vacuum Relief Containment Isolation Check Valve A – IRC	VFS-PL-V803A	Yes	
Vacuum Relief Containment Isolation Check Valve B – IRC	VFS-PL-V803B	Yes	
Fan Coolers Return Containment Isolation Valve – IRC	VWS-PL-V082	Yes	N-5 Code Data Report
Fan Coolers Return Containment Isolation Valve – ORC	VWS-PL-V086	Yes	
Fan Coolers Return Containment Isolation Relief Valve – IRC	VWS-PL-V080	Yes	
Fan Coolers Supply Containment Isolation Valve – ORC	VWS-PL-V058	Yes	N-5 Code Data Report
Fan Coolers Supply Containment Isolation Check Valve – IRC	VWS-PL-V062	Yes	
Reactor Coolant Drain Tank (RCDT) Gas Outlet Containment Isolation Valve – IRC	WLS-PL-V067	Yes	N-5 Code Data Report
RCDT Gas Outlet Containment Isolation Valve – ORC	WLS-PL-V068	Yes	
Sump Discharge Containment Isolation Valve – IRC	WLS-PL-V055	Yes	N-5 Code Data Report
Sump Discharge Containment Isolation Valve – ORC	WLS-PL-V057	Yes	
Sump Discharge Containment Isolation Relief Valve – IRC	WLS-PL-V058	Yes	
Spare Penetration	CNS-PY-C01	Yes	N-5 Code Data Report
Spare Penetration	CNS-PY-C02	Yes	N-5 Code Data Report
Spare Penetration	CNS-PY-C03	Yes	N-5 Code Data Report

Attachment A

SYSTEM: Containment System (CNS)

Equipment Name *	Tag No. *	ASME Code Section III *	N-5 Report
Main Equipment Hatch	CNS-MY-Y01	Yes	N-5 Code Data Report
Maintenance Hatch	CNS-MY-Y02	Yes	N-5 Code Data Report
Personnel Hatch	CNS-MY-Y03	Yes	N-5 Code Data Report
Personnel Hatch	CNS-MY-Y04	Yes	N-5 Code Data Report
Containment Vessel	CNS-MV-01	Yes	N-5 Code Data Report
Electrical Penetration P03	DAS-EY-P03Z	Yes	N-5 Code Data Report
Electrical Penetration P01	ECS-EY-P01X	Yes	N-5 Code Data Report
Electrical Penetration P02	ECS-EY-P02X	Yes	N-5 Code Data Report
Electrical Penetration P06	ECS-EY-P06Y	Yes	N-5 Code Data Report
Electrical Penetration P07	ECS-EY-P07X	Yes	N-5 Code Data Report
Electrical Penetration P09	ECS-EY-P09W	Yes	N-5 Code Data Report
Electrical Penetration P10	ECS-EY-P10W	Yes	N-5 Code Data Report
Electrical Penetration P11	IDSA-EY-P11Z	Yes	N-5 Code Data Report
Electrical Penetration P12	IDSA-EY-P12Y	Yes	N-5 Code Data Report
Electrical Penetration P13	IDSA-EY-P13Y	Yes	N-5 Code Data Report
Electrical Penetration P14	IDSD-EY-P14Z	Yes	N-5 Code Data Report
Electrical Penetration P15	IDSD-EY-P15Y	Yes	N-5 Code Data Report
Electrical Penetration P16	IDSD-EY-P16Y	Yes	N-5 Code Data Report
Electrical Penetration P17	ECS-EY-P17X	Yes	N-5 Code Data Report
Electrical Penetration P18	ECS-EY-P18X	Yes	N-5 Code Data Report

Attachment A

SYSTEM: Containment System (CNS)

Equipment Name *	Tag No. *	ASME Code Section III *	N-5 Report
Electrical Penetration P19	ECS-EY-P19Z	Yes	N-5 Code Data Report
Electrical Penetration P20	ECS-EY-P20Z	Yes	N-5 Code Data Report
Electrical Penetration P21	EDS-EY-P21Z	Yes	N-5 Code Data Report
Electrical Penetration P22	ECS-EY-P22X	Yes	N-5 Code Data Report
Electrical Penetration P23	ECS-EY-P23X	Yes	N-5 Code Data Report
Electrical Penetration P24	ECS-EY-P24	Yes	N-5 Code Data Report
Electrical Penetration P25	ECS-EY-P25W	Yes	N-5 Code Data Report
Electrical Penetration P26	ECS-EY-P26W	Yes	N-5 Code Data Report
Electrical Penetration P27	IDSC-EY-P27Z	Yes	N-5 Code Data Report
Electrical Penetration P28	IDSC-EY-P28Y	Yes	N-5 Code Data Report
Electrical Penetration P29	IDSC-EY-P29Y	Yes	N-5 Code Data Report
Electrical Penetration P30	IDSB-EY-P30Z	Yes	N-5 Code Data Report
Electrical Penetration P31	IDSB-EY-P31Y	Yes	N-5 Code Data Report
Electrical Penetration P32	IDSB-EY-P32Y	Yes	N-5 Code Data Report
Instrument Penetration P46	PCS-PY-C01	Yes	N-5 Code Data Report
Instrument Penetration P47	PCS-PY-C02	Yes	N-5 Code Data Report
Instrument Penetration P48	PCS-PY-C03	Yes	N-5 Code Data Report
Instrument Penetration P49	PCS-PY-C04	Yes	N-5 Code Data Report

*Excerpt from COL Appendix C Table 2.2.1-1

Attachment B

SYSTEM: Containment System (CNS)

Line Name*	Line Number*	ASME Code Section III*	N-5 Report
Instrument Air In	CAS-PL-L015 +	Yes	N-5 Code Data Report
Service Air In	CAS-PL-L204 +	Yes	N-5 Code Data Report
Component Cooling Water Supply to Containment	CCS-PL-L201	Yes	N-5 Code Data Report
Component Cooling Water Outlet from Containment	CCS-PL-L207	Yes	N-5 Code Data Report
Demineralized Water In	DWS-PL-L245 +, L230	Yes	N-5 Code Data Report
Fire Protection Supply to Containment	FPS-PL-L107	Yes	N-5 Code Data Report
Containment Atmosphere Return Line	PSS-PL-L038 +	Yes	N-5 Code Data Report
Common Primary Sample Line A/B	PSS-PL-T005A/B	Yes	N-5 Code Data Report
Containment Atmosphere Sample Line	PSS-PL-T031	Yes	N-5 Code Data Report
Spent Fuel Pool Cooling Discharge	SFS-PL-L017	Yes	N-5 Code Data Report
Spent Fuel Pool Cooling Suction from Containment	SFS-PL-L038	Yes	N-5 Code Data Report
Containment Purge Inlet to Containment	VFS-PL-L104, L105, L106	Yes	N-5 Code Data Report
Containment Purge Discharge from Containment	VFS-PL-L203, L204, L205, L800, L801A/B, L803, L804, L805A/B, L810A/B, L832	Yes	N-5 Code Data Report
Fan Cooler Supply Line to Containment	VWS-PL-L032	Yes	N-5 Code Data Report
Fan Cooler Return Line from Containment	VWS-PL-L055	Yes	N-5 Code Data Report
RCDT Gas Out	WLS-PL-L022	Yes	N-5 Code Data Report
Waste Sump Out	WLS-PL-L073	Yes	N-5 Code Data Report

*Excerpt from COL Appendix C, Table 2.2.1-2

+ These lines require that dynamic loads in its pipe stress analysis satisfy the requirements of ASME Code Section III (1989 Edition, 1989 Addenda) for girth fillet welds between piping and socket welded fittings, valves and flanges per VEGP UFSAR Section 5.2.1.1 (Reference 3)