



**FEB 22 2018**

Docket Nos.: 52-025  
52-026

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ND-18-0213  
10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission  
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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 E.3.9.06.00.03 [Index Number 861]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of February 15, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item E.3.9.06.00.03 [Index Number 861] 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 E.3.9.06.00.03 [Index Number 861]

MJY/LBP/amw

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Document Services RTYPE: VND.LI.L06  
File AR.01.02.06

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**Southern Nuclear Operating Company  
ND-18-0213  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC E.3.9.06.00.03 [Index Number 861]**

## **ITAAC Statement**

### **Program Commitment**

6.3 The means exists to continuously assess the impact of the release of radioactive materials to the environment, accounting for the relationship between effluent monitor readings, and onsite and offsite exposures and contamination for various meteorological conditions. [I.4]

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

6.3 A test will be performed to demonstrate that the impact of a radiological release to the environment is able to be assessed by utilizing the relationship between effluent monitor readings, and onsite and offsite exposures and contamination for various meteorological conditions.

### **Acceptance Criteria**

6.3 Response personnel demonstrated that the means exist to continuously assess the impact of the release of radioactive materials to the environment, accounting for the relationship between effluent monitoring readings, and onsite and offsite exposures and contamination for various meteorological conditions under drill conditions.

## **ITAAC Completion Description**

A test (drill) is performed to demonstrate that the impact of a radiological release to the environment is able to be assessed by utilizing the relationship between effluent monitor readings, and onsite and offsite exposures and contamination for various meteorological conditions. A drill scenario, simulating a radiological release to the environment, is developed and conducted using procedure NMP-EP-303, Drill and Exercise Standards (Reference 1). Evaluation of the drill performance confirms that VEGP Unit 3 & Unit 4 and Emergency Operations Facility (EOF) response personnel demonstrate that the means exist to continuously assess the impact of the release of radioactive materials to the environment, accounting for the relationship between effluent monitoring readings, and onsite and offsite exposures and contamination for various meteorological conditions.

Personnel respond to the Technical Support Center, EOF, and Operations Support Center based on a scenario involving the release of radioactive materials to the environment. In-plant radiological survey team(s) and offsite Field Monitoring Team(s) are dispatched to perform on-site and off-site radiological surveys.

Procedure NMP-EP-XXX, In-Plant Surveys (Reference 2) is used to perform onsite radiological surveys to assess onsite dose rates (exposures) and contamination levels during the radioactive material release. Procedure NMP-EP-147-00X, SNC Field Monitoring Teams Radiological Surveys and Sampling (Reference 3) is used to perform offsite radiological surveys to assess offsite dose rates (exposures) and contamination (deposition) levels during the radioactive material release. Procedure NMP-EP-147, Offsite Dose Assessment (Reference 4) is used to continuously assess the impact of the release of radioactive materials to the environment based on effluent monitor readings, meteorological conditions, and results of offsite radiological surveys under varying meteorological conditions.

Scenario-specific drill objectives are generated using the guidance provided in procedure NMP-EP-303 to evaluate that response personnel are able to demonstrate that the means exist to continuously assess the impact of the release of radioactive materials to the environment, accounting for the relationship between effluent monitoring readings, and onsite and offsite exposures and contamination for various meteorological conditions. An evaluation of drill performance is conducted per procedure NMP-EP-303 to confirm that the drill objectives associated with response personnel demonstrating that the means exist to continuously assess the impact of the release of radioactive materials to the environment, accounting for the relationship between effluent monitoring readings, and onsite and offsite exposures and contamination for various meteorological conditions under drill conditions, are met.

The drill performance (test) results are documented in Drill/Exercise Report XXX (Reference 5) per procedure NMP-EP-303. Drill/Exercise Report XXX documents and confirms that VEGP Unit 3 & 4 and EOF response personnel demonstrated that the means exist to continuously assess the impact of the release of radioactive materials to the environment, accounting for the relationship between effluent monitoring readings, and onsite and offsite exposures and contamination for various meteorological conditions under drill conditions.

Reference 5 is available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC E.3.9.06.00.03 Completion Packages (References 6 and 7).

#### **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. Procedure NMP-EP-303, Drill and Exercise Standards
2. Procedure NMP-EP-XXX, In-Plant Surveys
3. Procedure NMP-EP-147-00X, SNC Field Monitoring Teams Radiological Surveys and Sampling
4. Procedure NMP-EP-147, Offsite Dose Assessment
5. Drill/Exercise Report XXX
6. ITAAC E.3.9.06.00.03 Completion Package (Unit 3)
7. ITAAC E.3.9.06.00.03 Completion Package (Unit 4)
8. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"