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ND-18-0240
10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission
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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 2.1.03.03 [Index Number 72]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of February 21, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.1.03.03 [Index Number 72] 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,

A handwritten signature in dark ink, appearing to read "Michael J. Yox", written over a light blue horizontal line.

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 2.1.03.03 [Index Number 72]

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**Southern Nuclear Operating Company
ND-18-0240
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.1.03.03 [Index Number 72]**

ITAAC Statement

Design Commitment:

3. The components identified in Table 2.1.3-1 as ASME Code Section III are designed and constructed in accordance with ASME Code Section III requirements.
4. Pressure boundary welds in components identified in Table 2.1.3-1 as ASME Code Section III meet ASME Code Section III requirements.
5. The pressure boundary components (RV, CRDMs, and incore instrument QuickLoc assemblies) identified in Table 2.1.3-1 as ASME Code Section III retain their pressure boundary integrity at their design pressure.

Inspections, Tests, Analyses:

Inspection will be conducted of the as-built components 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.

A hydrostatic test will be performed on the components of the RXS required by the ASME Code Section III to be hydrostatically tested.

Acceptance Criteria:

The ASME Code Section III design reports exist for the as-built components identified in Table 2.1.3-1 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 hydrostatic test of the pressure boundary components (RV, CRDMs, and incore instrument QuickLoc assemblies) 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 Reactor System (RXS) components listed in the Combined License (COL) Appendix C, Table 2.1.3-1 (Attachment A) that are identified as American Society of Mechanical Engineers (ASME) Code Section III are designed and constructed in accordance with applicable requirements.

3. The ASME Code Section III design reports exist for the as-built components identified in Table 2.1.3-1 as ASME Code Section III.

Each component listed in Table 2.1.3-1 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 components listed in Table 2.1.3-1 as ASME Code Section III, are subjected to a reconciliation process (Reference 2), which verifies that the as-built components 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 2.1.3-1 (Attachment A) 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), Section III requirements as described in subsection 5.2.1 of the UFSAR (Reference 3). The N-5 Code Data Reports for the the components listed in the Table 2.1.3-1 are identified in Attachment A.

4. 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 2.1.3-1 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 2.1.3-1 as ASME Code Section III meet ASME Code Section III requirements.

5. A report exists and concludes that the results of the hydrostatic test of the pressure boundary components (RV, CRDMs, and incore instrument QuickLoc assemblies) conform with the requirements of the ASME Code Section III.

A hydrostatic test is performed by the vendor to demonstrate that the components (RV, CRDMs, and incore instrument QuickLoc assemblies) identified in Table 2.1.3-1 (Attachment A) as ASME Code Section III retain their pressure boundary integrity at their design pressure. A hydrostatic test verifies that there are no leaks at welds and that the pressure boundary integrity is retained at its 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 2.1.3-1 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 testing results of the component's pressure boundary are documented in the Hydrostatic 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 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 2.1.3-1 as ASME Code Section III are documented in the Hydrostatic Testing Report(s) within the supporting data packages and meets ASME Code Section III requirements.

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 identified in Table 2.1.3-1 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 weld; and
- A report exists and concludes that the results of the hydrostatic test of the pressure boundary components (RV, CRDMs, and incore instrument QuickLoc assemblies) 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 2.1.03.03 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 73 and 74, found no relevant ITAAC findings associated with this ITAAC.

References (available for NRC inspection)

1. RXS 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
 - a. Subsection 5.2.1, Compliance with Codes and Code Cases
4. Completion Package for Unit 3 ITAAC 2.1.03.03 [COL Index Number 72]
5. Completion Package for Unit 4 ITAAC 2.1.03.03 [COL Index Number 72]
6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A

SYSTEM: Reactor System (RXS)

Equipment Name *	Tag No. *	ASME Code Section III Classification*	N-5 Report
RV	RXS-MV-01	Yes	N-5 Code Data Report
Reactor Upper Internals Assembly	RXS-MI-01	Yes	N-5 Code Data Report
Reactor Lower Internals Assembly	RXS-MI-02	Yes	N-5 Code Data Report
Control Rod Drive Mechanisms (CRDMs) (69 Locations)	RXS-MV- 11B06/11B08/11B10/11C05/11C07/11C09/ 11C11/11D04/11D06/11D08/11D10/11D12/ 11E03/11E05/11E07/11E09/11E11/11E13/ 11F02/11F04/11F06/11F08/11F10/11F12/ 11F14/11G03/11G05/11G07/11G09/11G11/ 11G13/11H02/11H04/11H06/11H08/11H10/ 11H12/11H14/11J03/11J05/11J07/11J09/ 11J11/11J13/11K02/11K04/11K06/ 11K08/11K10/11K12/11K14/11L03/11L05/ 11L07/11L09/11L11/11L13/11M04/11M06/ 11M08/11M10/11M12/11N05/11N07/11N09/ 11N11/11P06/11P08/11P10	Yes	N-5 Code Data Report
Incore Instrument QuickLoc Assemblies (8 Locations)	RXS-MY-Y11 through Y18	Yes	N-5 Code Data Report

*Excerpt from COL Appendix C Table 2.1.3-1