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U.S. Nuclear Regulatory Commission
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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3
ITAAC Closure Notification on Completion of ITAAC 2.3.09.03.iii [Index Number 425]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 3 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.3.09.03.iii [Index Number 425] for verifying the Containment Hydrogen Control System (VLS) provides the nonsafety-related function to control the containment hydrogen concentration for beyond design basis accidents. The closure process for this ITAAC is based on 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.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Tom Petrak at 706-848-1575.

Respectfully submitted,


Michael J. Yox
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Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC 2.3.09.03.iii [Index Number 425]

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**Southern Nuclear Operating Company
ND-18-1139
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC 2.3.09.03.iii [Index Number 425]**

ITAAC Statement

Design Commitment

3. The VLS provides the nonsafety-related function to control the containment hydrogen concentration for beyond design basis accidents.

Inspections, Tests, Analysis

iii) An inspection of the as-built containment internal structures will be performed.

Acceptance Criteria

iii) The equipment access opening and CMT-A opening constitute at least 98% of the vent path area from Room 11206 to Room 11300. The minimum distance between the equipment access opening and the containment shell is at least 24.3 feet. The minimum distance between the CMT-A opening and the containment shell is at least 9.4 feet. The CMT-B opening constitutes at least 98% of the vent path area from Room 11207 to Room 11300 and is a minimum distance of 24.6 feet away from the containment shell. Other openings through the ceilings of these rooms must be at least 3 feet from the containment shell.

ITAAC Determination Basis

Multiple ITAAC are performed to demonstrate that the Containment Hydrogen Control System (VLS) provides the nonsafety-related function to control the containment hydrogen concentration for beyond design basis accidents. The subject ITAAC requires an inspection of the as-built containment internal structures be performed.

A visual inspection (Reference 1) of the ceilings in containment Rooms 11206 and 11207 was performed to identify all openings to Room 11300 above. Three openings were identified in each of the ceilings of Room 11206 and 11207. Room 11206 contained an equipment access opening, personnel access opening, and CMT-A opening. Room 11207 contained an equipment access opening, personnel access opening, and CMT-B opening. SV3-AD11-Z0-001 (Reference 2) documents that the personnel access opening in Room 11206 will have a watertight hatch installed. In addition, the equipment access opening and the personnel access opening in Room 11207 will have watertight hatches installed. Table 1 identifies the watertight hatches for the openings.

Table 1, Watertight Hatches

Opening	Hatch Number
Room 11206	
Personnel Hatch	SV3-11300-AD-H11
Room 11207	
Personnel Hatch	SV3-11300-AD-H03
Equipment Hatch	SV3-11300-AD-H04

Vogtle Unit 3 & 4 Updated Final Safety Analysis Report (UFSAR) Sections 3.4.1.1.2 and 3.4.1.2.2.1 document that watertight hatches are provided to close openings not required for hydrogen venting. Therefore, these openings are not credited for hydrogen venting in this ITAAC. The only openings applicable to this ITAAC are the equipment access opening and CMT-A opening in Room 11206, and the CMT-B opening in Room 11207.

The equipment access opening and the CMT-A opening are the only openings in Room 11206 (100% of vent path area), and meets the acceptance criteria of at least 98% of the vent path area from Room 11206 to Room 11300. The CMT-B opening is the only opening in Room 11207 (100% of vent path area), and meets the acceptance criteria of at least 98% of the vent path area from Room 11207 to Room 11300.

An inspection (Reference 1) of the applicable openings in Rooms 11206 and 11207 was performed to verify the hydrogen vent path openings and the distance between the openings and the containment shell met the acceptance criteria. Measurements were taken and documented in Reference 1, and Table 2 below provides a summary of the results.

Table 2, Inspection Results

Opening	ITAAC Acceptance Criteria Minimum Distance (feet)	As-Built Survey Distance (feet)
Room 11206		
Equipment Access Opening	24.3	24.8
CMT-A Opening	9.4	10.0
Room 11207		
CMT-B Opening	24.6	25.1

The equipment access opening and CMT-A opening constitute at least 98% of the vent path area from Room 11206 to Room 11300. The minimum distance between the equipment access opening and the containment shell is at least 24.3 feet. The minimum distance between the CMT-A opening and the containment shell is at least 9.4 feet. The CMT-B opening constitutes at least 98% of the vent path area from Room 11207 to Room 11300 and is a minimum distance of 24.6 feet away from the containment shell. No other openings through the ceilings of rooms 11206 and 11207 were identified.

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all ITAAC findings pertaining to the subject ITAAC and associated corrective actions. This review found that there are no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.3.09.03.iii (Reference 3) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.3.09.03.iii was performed for VEGP Unit 3 and that the prescribed acceptance criteria were met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. SV3-VLS-FSK-800425, Rev. 1, Containment Hydrogen Vent Openings As-Built Verification
2. SV3-AD11-Z0-001, Rev. 1, Design Specification for Safety-Related Floor Hatch Assemblies
3. 2.3.09.03.iii-U3-CP-Rev 0, ITAAC Completion Package