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ND-19-0022
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 2.5.02.06c.i [Index Number 532]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of January 14, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.5.02.06c.i [Index Number 532] 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 2.5.02.06c.i [Index Number 532]
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**Southern Nuclear Operating Company
ND-19-0022
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.5.02.06c.i [Index Number 532]**

ITAAC Statement

Design Commitment

6.c) The PMS provides manual initiation of reactor trip and selected engineered safety features as identified in Table 2.5.2-4.

Inspections, Tests, Analyses

An operational test of the as-built PMS will be performed using the PMS manual actuation controls.

Acceptance Criteria

i) The reactor trip switchgear opens after manual reactor trip controls are actuated.

ITAAC Completion Description

Multiple ITAAC are performed to verify that the Protection and Safety Monitoring System (PMS) provides manual initiation of reactor trip and selected engineered safety features as identified in Combined License (COL) Appendix C, Table 2.5.2-4, (Attachment A). The subject ITAAC performs an operational test of the reactor trip function using the PMS manual actuation controls.

Operational testing is performed in accordance with Unit 3 and Unit 4 preoperational test procedures 3(4)-PMS-ITPP-504 (References 1 and 2 respectively), and 3(4)-DDS-ITPP-520 (References 3 and 4 respectively), to confirm that the reactor trip switchgear opens after manual reactor trip controls are actuated.

Preoperational test procedure 3(4)-PMS-ITPP-504 verifies the Reactor Trip Circuit Breakers (RTCBs) are closed. The reactor trip is then manually actuated at the Primary Dedicated Safety Panel (PDSP) by placing hand switch 3(4)-PMS-HS025, reactor trip, in the trip position. Each RTCB is verified to be open locally at the Reactor Trip Switchgear Cabinet, at the Maintenance and Test Panel, and on the Main Control Room displays. Testing is repeated for reactor trip hand switch 3(4)-PMS-HS026. Test procedure 3(4)-DDS-ITPP-520 transfers control from the main control room to the remote shutdown workstation, ensures all RTCBs are closed, then places the same reactor trip hand switch, 3(4)-PMS-HS025, in the trip position. The RTCBs are then verified open, and the process is repeated for reactor trip hand switch 3(4)-PMS-HS026.

Results of the preoperational testing are documented in Unit 3 and Unit 4 preoperational test procedures (References 1, 2, 3, and 4), and confirm that the reactor trip switchgear opens after manual reactor trip controls are actuated.

References 1 through 4 are available for NRC inspection as part of Unit 3 and Unit 4 ITAAC 2.5.02.06c.i Completion Packages (Reference 5 and 6, respectively).

List of ITAAC Findings

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company performed a review of all ITAAC findings pertaining to the subject ITAAC and

associated corrective actions. This review found there are no relevant ITAAC findings associated with the ITAAC.

References (available for NRC inspection)

1. 3-PMS-ITPP-504, "PMS Reactor Trip Breakers"
2. 4-PMS-ITPP-504, "PMS Reactor Trip Breakers"
3. 3-DDS-ITPP-520, "Data and Display Processing System Remote Shutdown Room Preoperational Test Procedure"
4. 4-DDS-ITPP-520, "Data and Display Processing System Remote Shutdown Room Preoperational Test Procedure"
5. 2.5.02.06c.i-U3-CP-Rev 0, ITAAC Completion Package
6. 2.5.02.06c.i-U4-CP-Rev 0, ITAAC Completion Package
7. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A

| Table 2.5.2-4 PMS Manually Actuated Functions | |
|---|--|
| Reactor Trip | |
| Safeguards Actuation | |
| Containment Isolation | |
| Depressurization System Stages 1, 2, and 3 Actuation | |
| Depressurization System Stage 4 Actuation | |
| Feedwater Isolation | |
| Core Makeup Tank Injection Actuation | |
| Steam Line Isolation | |
| Passive Containment Cooling Actuation | |
| Passive Residual Heat Removal Heat Exchanger Alignment | |
| IRWST Injection | |
| Containment Recirculation Actuation | |
| Main Control Room Isolation, Air Supply Initiation, and Electrical Load De-energization | |
| Steam Generator Relief Isolation | |
| Chemical and Volume Control System Isolation | |
| Normal Residual Heat Removal System Isolation | |
| Containment Vacuum Relief | |