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52-026ND-19-0042  
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 3.3.00.02a.i.d [Index Number 763]

Ladies and Gentlemen:

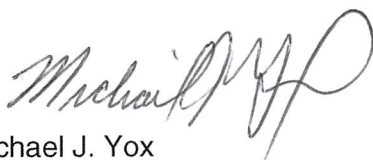
Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of January 25, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) Item 3.3.00.02a.i.d [Index Number 763] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 3.3.00.02a.i.d [Index Number 763]. 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 3.3.00.02a.i.d [Index Number 763]

MJY/GJL/sfr

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**Southern Nuclear Operating Company  
ND-19-0042  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC Item 3.3.00.2a.i.d [Index No. 763]**

## **ITAAC Statement**

### **Design Commitment**

2.a) The nuclear island structures, including the critical sections listed in Table 3.3-7, are seismic Category I and are designed and constructed to withstand design basis loads as specified in the Design Description, without loss of structural integrity and the safety-related functions.

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

i) An inspection of the nuclear island structures will be performed. Deviations from the design due to as-built conditions will be analyzed for the design basis loads.

### **Acceptance Criteria**

i.d) A report exists which reconciles deviations during construction and concludes that the as-built structures in the radiologically controlled area of the auxiliary building, including the critical sections, conform to the approved design and will withstand the design basis loads specified in the Design Description without loss of structural integrity or the safety-related functions.

## **ITAAC Completion Description**

Multiple ITAAC are performed to demonstrate that the nuclear island structures, including the critical sections listed in VEGP Unit 3 and Unit 4 Combined License (COL) Appendix C Table 3.3-7 (Attachment A), are seismic Category I and are designed and constructed to withstand design basis loads as specified in the VEGP Unit 3 and Unit 4 COL Appendix C Section 3.3 Design Description, without loss of structural integrity and the safety-related functions. The subject ITAAC verifies inspections of the as-built structures in the radiologically controlled area of the auxiliary building, including the critical sections, and reconciles deviations during construction to the approved design such that the as-built structures will withstand design basis loads without loss of structural integrity or the safety-related functions.

Design bases loads are defined in VEGP Unit 3 and Unit 4 COL Appendix C Section 3.3 as those loads associated with:

- Normal plant operation (including dead loads, live loads, lateral earth pressure loads, and equipment loads, including hydrodynamic loads, temperature and equipment vibration);
- External events (including rain, snow, flood, tornado, tornado-generated missiles and earthquake); and
- Internal events (including flood, pipe rupture, equipment failure, and equipment failure generated missiles).

VEGP 3&4 Updated Final Safety Analysis Report, Section 3.7 "Seismic Design", Section 3.8 "Design of Category I Structures", and Appendix 3H "Auxiliary and Shield Building Critical Sections" describe the analyses for the design basis loads for the Nuclear Island Structures. Section 3.8 specifies the applicable codes and standards governing the design, materials, fabrication, construction inspection and testing for the Nuclear Island structures. Section 3.8

also describes the as-built design summary reports which document that the seismic Category I structures meet the specified acceptance criteria.

The structures in the radiologically controlled area of the auxiliary building, including the critical sections, listed in Attachment A, are constructed as designed and specified in the VEGP Unit 3 and Unit 4 COL Appendix C Section 3.3 Design Description to withstand the Design Description design basis loads without loss of structural integrity and the safety-related functions.

The as-built structures in the radiologically controlled area of the auxiliary building, including the critical sections listed in Attachment A, are inspected during construction to verify the as-built structures conform to the specified design, codes, and standards. Identified structural deviations are documented, evaluated, and reconciled by engineering to confirm the structures' ability to withstand design basis loads. The Unit 3 and Unit 4 Auxiliary Building, CA20 Module, and Nuclear Island Basement As-Built Summary Reports (References 1 through 6) exist and document the reconciliation of NI structural deviations identified during construction and conclude that the as-built structures in the radiologically controlled area of the auxiliary building, including the critical sections, will withstand the design basis loads specified in the Design Description without loss of structural integrity or the safety-related functions.

References 1 through 6 are available for NRC inspection as part of Unit 3 and Unit 4 ITAAC 3.3.00.02a.i.d Completion Packages (References 7 and 8, respectively).

### **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 four (4) closed Cited Violations, five (5) closed and two (2) open Non-Cited Violations, one (1) closed Unresolved Item, one (1) closed Licensee Identified Violation, and four (4) closed Notice of Nonconformances associated with this ITAAC.

- 1      05200025/2012004-01 (Cited Violation, Closed) - Failure to translate CA01 and CA20 design requirements into specifications and drawings. (ML12319A458)
  - a. The ITAAC completion review determined that all corrective actions associated with this finding are completed and closed. NRC closure of this finding is documented in NRC Inspection Report 05200025/2013-004. (ML13312A316)
- 2      05200025/2012004-02 (Cited Violation, Closed) As-Built submodule CA20-04, auxiliary building embed plates and nuclear island reinforcement steel not in accordance with procurement documents. (ML12319A458)
  - a. The ITAAC completion review determined that all corrective actions associated with this finding are completed and closed. NRC closure of this finding is documented in NRC Inspection Report 05200025/2013-005. (ML14024A594)
- 3      05200025/2012008-01 (Cited Violation, Closed) — Failure to assure design services were accomplished with the appropriate design control measures. (ML12139A192)

- a. The ITAAC completion review determined that all corrective actions associated with this finding are completed and closed. NRC closure of this finding is documented in NRC Inspection Report 05200025/2012-004. (ML12319A458)
- 4 05200025/2013002-01 (Unresolved Item, Closed) – Anchorage and spacing of the headed shear reinforcement. (ML13127A392)
  - a. The ITAAC completion review determined that all corrective actions associated with this finding are completed and closed. NRC closure of this finding is documented in NRC Inspection Report 05200025/2013-003. (ML13207A241)
- 5 05200025/2013004-01 (Non-cited Violation, Closed) — Inadequate source and receipt inspections of safety-related embed plates. (ML13312A316)
  - a. The ITAAC completion review determined that all corrective actions associated with this finding are completed and closed. NRC closure of this finding is documented in NRC Inspection Report 05200025/2014-008. (ML14087A320)
- 6 05200025/2014002-001 (Non-cited Violation, Closed) Inadequate anchorage of shear stirrups in precast elements of reinforced concrete slabs. (ML14112A413)
  - a. The ITAAC completion review determined that all corrective actions associated with this finding are completed and closed. NRC closure of this finding is documented in NRC Inspection Report 05200025/2014-003. (ML14218A213)
- 7 05200025/2014005-001 (Non-cited Violation, Closed) - Failure to establish qualified welding procedures in accordance with AWS D1.1:2000. (ML15037A406)
  - a. The ITAAC completion review determined that all corrective actions associated with this finding are completed and closed. NRC closure of this finding is documented in NRC Inspection Report 05200025/2015-004. (ML16032A554)
- 8 05200025/2015002-01 and 05200026/2015002-01 (Non-cited Violation, Closed) — Weld allowable stress calculation not in compliance with current licensing basis. (ML15223B074)
  - a. The ITAAC completion review determined that all corrective actions associated with this finding are completed and closed. NRC closure of this finding is documented in NRC Inspection Report 05200025/2015004. (ML16032A554)
- 9 05200025/2015002-02 (Non-cited Violation, Open) - Spent fuel pool wall repair without an approved procedure. (ML15223B074)
- 10 05200025/2016001-01 and 05200026/2016001-01 (Non-cited Violation, Open) – Failure to perform AISC N690-94 required weld NDE. (ML16132A557)
11. 05200025/2012008-02 (Cited Violation, Closed) – Failure to seek NRC approval for Departing from Tier 2\* information. (ML12139A192)

- a. The ITAAC completion review determined that all corrective actions associated with this finding are completed and closed. NRC closure of this finding is documented in NRC Inspection Report 05200025/2012-004. (ML12319A458)
12. 05200025/2013003-01 (Licensee Identified Violation, Closed) – Headed shear reinforcement anchorage in auxiliary building basemat and walls. (ML13207A241)
  - a. The ITAAC completion review determined that all corrective actions associated with this finding are completed and closed. NRC closure of this finding is documented in NRC Inspection Report 05200025/2013-003. (ML13207A241)
13. 05200025/2015001-01 (Non-cited Violation, Closed) – Failure to identify nonconforming overlay plates. (ML15124A857)
  - a. The ITAAC completion review determined that all corrective actions associated with this finding are completed and closed. NRC closure of this finding is documented in NRC Inspection Report 05200025/2015001. (ML15124A857)
14. 99901409/2011-201-03 (Notice of Nonconformance, Closed) – Failure to implement the requirements of 10 CFR 50 App B Criterion III, “Design Control”. (ML11286A106)
  - a. The ITAAC completion review determined that all corrective actions associated with this finding are completed and closed. NRC closure of this finding is documented in NRC Inspection Report 99901409/2011-201. (ML18186A573)
15. 99901419/2012-201-03 (Notice of Nonconformance, Closed) – Failed to establish and implement a program for inspection of activities affecting quality to verify conformance with the documented instructions, procedures, and drawings. (ML13042A397)
  - a. The ITAAC completion review determined that all corrective actions associated with this finding are completed and closed. NRC closure of this finding is documented in NRC Inspection Report 99901419/2012-201. (ML18131A260)
16. 99901488/2014-201-02 and 99901449/2014-201-02 (Notice of Nonconformance, Closed) – Failing to perform a technical evaluation to justify that the critical characteristics and associated acceptance methods selected for CA20 components to provide reasonable assurance that the CA20 module would perform their intended functions. (ML14308A463)
  - a. The ITAAC completion review determined that all corrective actions associated with this finding are completed and closed. NRC closure of this finding is documented in NRC Inspection Report 99901448/2017-201. (ML17226A340)
17. 99901425/2014-201-01 (Notice of Nonconformance, Closed) – Failure to correctly identify open nonconformances in the documentation of a sub-module prepared to be shipped. (ML14072A315)
  - a. The ITAAC completion review determined that all corrective actions associated with this finding are completed and closed. NRC closure of this finding is documented in



NRC memorandum dated April 12, 2018 (ML18101A168) as documented in NRC memorandum dated October 12, 2018 (ML18152B785).

Before submission of the ICN, corrective actions will be completed for all relevant ITAAC findings identified prior to ICN submission.

**References (available for NRC inspection)**

1. As-Built Summary Report for Unit 3 Auxiliary Building (SV3-BB-CCC-###)
2. As-Built Summary Report for Unit 4 Auxiliary Building (SV4-BB-CCC-###)
3. As-Built Summary Report for Unit 3 CA20 Module (SV3-EE-FFF-###)
4. As-Built Summary Report for Unit 4 CA20 Module (SV4-EE-FFF-###)
5. As-Built Summary Report for Unit 3 Nuclear Island Basemat (SV3-HH-JJJ-###)
6. As-Built Summary Report for Unit 4 Nuclear Island Basemat (SV4-HH-JJJ-###)
7. 3.3 00.02a.i.d-U3-CP-Rev 0, ITAAC Completion Package
8. 3.3 00.02a.i.d-U4-CP-Rev 0, ITAAC Completion Package
9. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A: Excerpt from COL Appendix C Table 3.3-7

<b>Nuclear Island Critical Structural Sections</b>
<u>Auxiliary Building</u> South wall of auxiliary building (column line 1), elevation 66'-6" to elevation 180'-0" Divider Wall Between the spent fuel pool and the fuel transfer canal.
<u>Nuclear island Basemat Below Auxiliary Building</u> Bay between reference column lines 1 and 2, and K2 and N.