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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 2.2.03.11a.i [Index Number 207]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of January 25, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.03.11a.i [Index Number 207] 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 2.2.03.11a.i [Index Number 207]

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**Southern Nuclear Operating Company
ND-19-0061
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.2.03.11a.i [Index Number 207]**

ITAAC Statement

Design Commitment

11.a) Controls exist in the MCR to cause the remotely operated valves identified in Table 2.2.3-1 to perform their active function(s).

Inspections, Tests, Analyses

i) Testing will be performed on the squib valves identified in Table 2.2.3-1 using controls in the MCR, without stroking the valve.

Acceptance Criteria

i) Controls in the MCR operate to cause a signal at the squib valve electrical leads that is capable of actuating the squib valve.

ITAAC Completion Description

Multiple ITAAC are performed to verify that controls exist in the Main Control Room (MCR) to cause the remotely operated valves identified in Combined License (COL) Appendix C Table 2.2.3-1 (Attachment A) to perform their active functions. The subject ITAAC performs testing on the squib valves listed in Attachment A.

Testing is performed in accordance with preoperational tests 3/4-PMS-ITPP-521 and 3/4-PMS-ITPP-522 (References 1 through 4) to verify that controls exist in the MCR to cause the valves identified in Attachment A to perform active functions. Testing is performed on the squib valves identified using controls in the MCR without stroking the valve and ensures the controls in the MCR operate to cause a signal at the squib valve electrical leads which is capable of actuating the squib valve.

Squib valve actuation signals generated in the Protection and Safety Monitoring System (PMS) are sent to the Component Interface Modules (CIM), resulting in an actuation of the CIM for the respective squib valve. The CIM is a safety-related component located inside the respective PMS cabinets which provides the capability for on/off control of individual safety-related plant components. Squib valve actuation signals output from the actuated CIM are sent to the respective squib valve through the squib valve controller. To provide overlap, testing in 3/4-PMS-ITPP-521 verifies the CIM is actuated when PMS controls are operated and testing in 3/4-PMS-ITPP-522 manually actuates the CIM and verifies the signal at the squib valve electrical leads.

Testing in 3/4-PMS-ITPP-521 initiates a containment recirculation actuation and in-containment refueling water storage tank injection in the PMS using PMS controls in the MCR. The squib valve actuation signals are verified at the CIM. Each squib valve identified in Attachment A has the electrical leads disconnected to prevent stroking the valve.

During testing in 3/4-PMS-ITPP-522, each squib valve identified in Attachment A has the squib valve igniters replaced with test resistor fixtures. Test resistance is corrected to the maximum resistance expected during accident conditions. The CIMs are manually actuated and a

multimeter along with a temporary data acquisition system is used to measure both firing current and voltage.

Circuit resistance is measured, and inside and outside containment temperatures are measured at multiple locations and are used to calculate the circuit resistance expected during accident conditions and at the minimum ambient temperature. The calculated circuit resistances are verified to meet the minimum and maximum allowable resistances.

The minimum signal necessary to actuate the squib valves is specified in valve design information as at least 3.7 amperes for 10 milliseconds. The information recorded during testing of voltage and firing current is utilized to confirm that a sufficient test signal is received at each of the squib valves.

Together, these test results (References 1 through 4) confirm that each squib valve identified in Attachment A receives a signal at the valve electrical leads that is capable of actuating the squib valve.

References 1, 2, 3, and 4 are available for NRC inspection as part of Unit 3 and Unit 4 ITAAC Completion Packages (Reference 5 and 6, 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 there are no relevant ITAAC findings associated with this ITAAC.

References (available for NRC inspection)

1. 3-PMS-ITPP-521, "Protection and Safety Monitoring System Logic Test Preoperational Test Procedure"
2. 4-PMS-ITPP-521, "Protection and Safety Monitoring System Logic Test Preoperational Test Procedure"
3. 3-PMS-ITPP-522, "PMS Squib Valve Controller Performance Preoperational Test"
4. 4-PMS-ITPP-522, "PMS Squib Valve Controller Performance Preoperational Test"
5. 2.2.03.11a.i-U3-CP-Rev 0, ITAAC Completion Package
6. 2.2.03.11a.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*

Equipment	Tag No.	Control PMS/DAS
Containment Recirculation A Squib Valve	PXS-PL-V118A	Yes/Yes
Containment Recirculation B Squib Valve	PXS-PL-V118B	Yes/Yes
Containment Recirculation A Squib Valve	PXS-PL-V120A	Yes/Yes
Containment Recirculation B Squib Valve	PXS-PL-V120B	Yes/Yes
IRWST Injection A Squib Valve	PXS-PL-V123A	Yes/Yes
IRWST Injection B Squib Valve	PXS-PL-V123B	Yes/Yes
IRWST Injection A Squib Valve	PXS-PL-V125A	Yes/Yes
IRWST Injection B Squib Valve	PXS-PL-V125B	Yes/Yes

*Excerpt from Combined License Appendix C Table 2.2.3-1