

JAN 31 2019

Docket Nos.: 52-025  
52-026

ND-19-0064  
10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555-0001

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 2.6.05.02.ii [Index Number 629]

Ladies and Gentlemen:

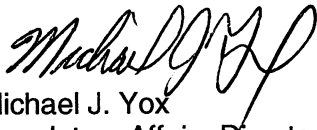
Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of January 31, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections Tests Analyses and Acceptance Criteria (ITAAC) Item 2.6.05.02.ii [Index Number 629] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.6.05.02.ii [Index Number 629]. 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)(3) 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 black ink, appearing to read "Michael J. Yox", written in a cursive style.

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 2.6.05.02.ii [Index Number 629]

MJY/DJG/sfr

**To:**

**Southern Nuclear Operating Company/ Georgia Power Company**

Mr. D. A. Bost (w/o enclosures)  
Mr. D. L. McKinney (w/o enclosures)  
Mr. M. D. Meier (w/o enclosures)  
Mr. D. H. Jones (w/o enclosures)  
Mr. J. B. Klecha  
Mr. G. Chick  
Mr. M. J. Yox  
Mr. A. S. Parton  
Ms. K. A. Roberts  
Mr. T. G. Petrak  
Mr. W. A. Sparkman  
Mr. C. T. Defnall  
Mr. C. E. Morrow  
Mr. J. L. Hughes  
Ms. K. M. Stacy  
Ms. A. C. Chamberlain  
Mr. J. C. Haswell  
Document Services RTYPE: VND.LI.L06  
File AR.01.02.06

**cc:**

**Nuclear Regulatory Commission**

Mr. W. Jones (w/o enclosures)  
Mr. F. D. Brown  
Ms. J. M. Heisserer  
Mr. C. P. Patel  
Mr. G. J. Khouri  
Ms. S. E. Temple  
Mr. N. D. Karlovich  
Mr. A. Lerch  
Mr. C. J. Even  
Mr. B. J. Kemker  
Ms. N. C. Coover  
Mr. C. Welch  
Mr. I. Cozens  
Mr. J. Gaslevic  
Mr. V. Hall

**Oglethorpe Power Corporation**

Mr. R. B. Brinkman  
Mr. E. Rasmussen

**Municipal Electric Authority of Georgia**

Mr. J. E. Fuller  
Mr. S. M. Jackson

**Dalton Utilities**

Mr. T. Bundros

**Westinghouse Electric Company, LLC**

Dr. L. Oriani (w/o enclosures)

Mr. D. C. Durham (w/o enclosures)

Mr. M. M. Corletti

Ms. L. G. Iller

Ms. J. Monahan

Mr. J. L. Coward

**Other**

Mr. J. E. Hesler, *Bechtel Power Corporation*

Ms. L. Matis, *Tetra Tech NUS, Inc.*

Dr. W. R. Jacobs, Jr., Ph.D., *GDS Associates, Inc.*

Mr. S. Roetger, *Georgia Public Service Commission*

Ms. S. W. Kernizan, *Georgia Public Service Commission*

Mr. K. C. Greene, *Troutman Sanders*

Mr. S. Blanton, *Balch Bingham*

**Southern Nuclear Operating Company  
ND-19-0064  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.6.05.02.ii [Index Number 629]**

## **ITAAC Statement**

### **Design Commitment**

2. The ELS has six groups of emergency lighting fixtures located in the MCR and at the RSW. Each group is powered by one of the Class 1E inverters. The ELS has four groups of panel lighting fixtures located on or near safety panels in the MCR. Each group is powered by one of the Class 1E inverters in Divisions B and C (one 24-hour and one 72-hour inverter in each Division).

5. The normal lighting can provide 50 foot candles at the safety panel and at the workstations in the MCR and at the RSW.

6. The emergency lighting can provide 10 foot candles at the safety panel and at the workstations in the MCR and at the RSW.

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

- i) Inspection of the as-built system will be performed.
- ii) Testing of the as-built system will be performed using one Class 1E inverter at a time.
- i) Testing of the as-built normal lighting in the MCR will be performed.
- ii) Testing of the as-built normal lighting at the RSW will be performed.
- i) Testing of the as-built emergency lighting in the MCR will be performed.
- ii) Testing of the as-built emergency lighting at the RSW will be performed.

### **Acceptance Criteria**

- i) The as-built ELS has six groups of emergency lighting fixtures located in the MCR and at the RSW. The ELS has four groups of panel lighting fixtures located on or near safety panels in the MCR.
- ii) Each of the six as-built emergency lighting groups is supplied power from its respective Class 1E inverter and each of the four as-built panel lighting groups is supplied power from its respective Class 1E inverter.
- i) When adjusted for maximum illumination and powered by the main ac power system, the normal lighting in the MCR provides at least 50 foot candles at the safety panel and at the workstations.
- ii) When adjusted for maximum illumination and powered by the main ac power system, the normal lighting in the RSW provides at least 50 foot candles at the safety panel and at the workstations.

i) When adjusted for maximum illumination and powered by the six Class 1E inverters, the emergency lighting in the MCR provides at least 10 foot candles at the safety panel and at the workstations.

ii) When adjusted for maximum illumination and powered by the six Class 1E inverters, the emergency lighting provides at least 10 foot candles at the RSW.

### **ITAAC Completion Description**

Multiple ITAAC are performed to demonstrate the Lighting System (ELS) has six groups of emergency lighting fixtures located in the Main Control Room (MCR) and at the Remote Shutdown Workstation (RSW) with each group being powered by one of the Class 1E inverters, the ELS has four groups of panel lighting fixtures located on or near safety panels in the MCR with each group being powered by one of the Class 1E inverters in Divisions B and C (one 24-hour and one 72-hour inverter in each Division), the normal lighting can provide 50 foot candles at the safety panel and at the workstations in the MCR and at the RSW, and the emergency lighting can provide 10 foot candles at the safety panel and at the workstations in the MCR and at the RSW. The subject ITAAC requires inspections of the as-built ELS, testing of the as-built ELS using one Class 1E inverter at a time, testing of the as-built normal lighting in the MCR and RSW, and testing of the as-built emergency lighting in the MCR and RSW.

i) The as-built ELS has six groups of emergency lighting fixtures located in the MCR and at the RSW. The ELS has four groups of panel lighting fixtures located on or near safety panels in the MCR.

The ELS in the MCR and RSW is inspected in accordance with ND-RA-001-012 (Reference 1). The results of the inspection are included in the Unit 3 and Unit 4 ITAAC Technical Reports SV3-ELS-ITR-800629 and SV4-ELS-ITR-800629 (References 2 and 3) and confirm that the as-built ELS has six groups of emergency lighting fixtures located in the MCR and at the RSW and the ELS has four groups of panel lighting fixtures located on or near safety panels in the MCR.

ii) Each of the six as-built emergency lighting groups is supplied power from its respective Class 1E inverter and each of the four as-built panel lighting groups is supplied power from its respective Class 1E inverter.

The six groups of emergency lighting fixtures located in the MCR and at the RSW, and the four groups of panel lighting fixtures located on or near the safety panels in the MCR, are tested in accordance with Unit 3 and Unit 4 preoperational test procedures, 3-ELS-ITPP-501, 4-ELS-ITPP-501, 3-IDS-ITPP-501, and 4-IDS-ITPP-501 (References 4 through 7). These fixtures are supplied power from their respective Class 1E inverter through the respective Class 1E distribution panel.

Testing to verify that each of the six as-built emergency lighting groups is supplied power from its respective Class 1E inverter and each of the four as-built panel lighting groups is supplied power from its respective Class 1E inverter is performed in two parts. Testing in 3/4-IDS-ITPP-501 verifies that the respective Class 1E inverter supplies power to the respective distribution panel through a load bank test. Testing in 3/4-ELS-ITPP-501 verifies that the respective

distribution panel supplies power to each group of emergency and panel lighting fixtures by de-energizing and re-energizing the group from the lighting panel breaker in the distribution panel and verifying that each lighting fixture in the respective group turns off and on.

The test results are included in References 4 through 7 and confirm that each of the six as-built emergency lighting groups is supplied power from its respective Class 1E inverter and each of the four as-built panel lighting groups is supplied power from its respective Class 1E inverter.

i) When adjusted for maximum illumination and powered by the main ac power system, the normal lighting in the MCR provides at least 50 foot candles at the safety panel and at the workstations.

The illumination levels of the normal lighting in the MCR are measured in accordance with Unit 3 and Unit 4 preoperational test procedures 3-ELS-ITPP-501 and 4-ELS-ITPP-501 (References 4 and 5). The testing is performed with all lighting fixtures powered from the main ac power source, the dimmer control set for maximum illumination, all large screen displays off, and all lighting in adjacent rooms with windows to the MCR off. The illumination levels at the safety panel and the workstations are measured with a light meter. The test results are included in References 4 and 5 and confirm that when adjusted for maximum illumination and powered by the main ac power system, the normal lighting in the MCR provides at least 50 foot candles at the safety panel and at the workstations.

ii) When adjusted for maximum illumination and powered by the main ac power system, the normal lighting in the RSW provides at least 50 foot candles at the safety panel and at the workstations.

The illumination levels of the normal lighting in the RSW are measured in accordance with Unit 3 and Unit 4 preoperational test procedures 3-ELS-ITPP-501 and 4-ELS-ITPP-501 (References 4 and 5). The testing is performed with all lighting fixtures powered from the main ac power source with the dimmer control set for maximum illumination. The illumination levels at the safety panel and the workstations are measured with a light meter. The test results are included in References 4 and 5 and confirm that when adjusted for maximum illumination and powered by the main ac power system, the normal lighting in the RSW provides at least 50 foot candles at the safety panel and at the workstations.

i) When adjusted for maximum illumination and powered by the six Class 1E inverters, the emergency lighting in the MCR provides at least 10 foot candles at the safety panel and at the workstations.

The illumination levels of the emergency lighting in the MCR are measured in accordance with Unit 3 and Unit 4 preoperational test procedures 3-ELS-ITPP-501 and 4-ELS-ITPP-501 (References 4 and 5). Testing is performed with the normal power isolated at the main breaker of each lighting panel, all lighting fixtures powered from the Class 1E inverters, the dimmer control set for maximum illumination, all large screen displays off, and all lighting in adjacent rooms with windows to the MCR off. The illumination levels at the safety panel and the workstations are measured with a light meter. The test results are included in References 4 and 5 and confirm that when adjusted for maximum illumination and powered by the six Class 1E



inverters, the emergency lighting in the MCR provides 10 foot candles at the safety panel and at the workstations.

ii) When adjusted for maximum illumination and powered by the six Class 1E inverters, the emergency lighting provides at least 10 foot candles at the RSW.

The illumination levels of the emergency lighting in the MCR and at the RSW are measured in accordance with Unit 3 and Unit 4 preoperational test procedures 3-ELS-ITPP-501 and 4-ELS-ITPP-501 (References 4 and 5). Testing is performed with the normal power isolated at the main breaker of each lighting panel, all lighting fixtures powered from the Class 1E inverters, and the dimmer control set for maximum illumination. The illumination levels at the safety panel and the workstations are measured with a light meter. The test results are included in References 4 and 5 and confirm that when adjusted for maximum illumination and powered by the six Class 1E inverters, the emergency lighting can provide 10 foot candles at the RSW.

References 2 through 7 are available for NRC inspection as part of Unit 3 and Unit 4 ITAAC Completion Packages (References 8 and 9).

#### **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. ND-RA-001-012, "Functional Arrangement Scoping Process"
2. SV3-ELS-ITR-800629, "Unit 3 ITAAC Technical Report"
3. SV4-ELS-ITR-800629, "Unit 4 ITAAC Technical Report"
4. 3-ELS-ITPP-501, Unit 3 "Lighting System Preoperational Test"
5. 4-ELS-ITPP-501, Unit 4 "Lighting System Preoperational Test"
6. 3-IDS-ITPP-501, Unit 3 "Class 1E DC and UPS Preoperational Test"
7. 4-IDS-ITPP-501, Unit 4 "Class 1E DC and UPS Preoperational Test"
8. 2.6.01.04d-U3-CP-Rev 0, ITAAC Completion Package
9. 2.6.01.04d-U4-CP-Rev 0, ITAAC Completion Package
10. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"