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52-026

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ND-19-0065
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 3.3.00.17 [Index Number 822]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of February 1, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 3.3.00.17 [Index Number 822] 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 & Unit 4
Completion Plan for Uncompleted ITAAC 3.3.00.17 [Index Number 822]

MJY/RLB/sfr

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**Southern Nuclear Operating Company
ND-19-0065
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 & Unit 4
Completion Plan for Uncompleted ITAAC 3.3.00.17 [Index Number 822]**

ITAAC Statement

Design Commitment

17. Vital areas are locked and alarmed with active intrusion detection systems that annunciate in the central and secondary alarm stations upon intrusion into a vital area.

Inspections/Tests/Analyses

An inspection of the as-built vital areas, and central and secondary alarm stations are performed.

Acceptance Criteria

Vital areas are locked and alarmed with active intrusion detection systems and intrusion is detected and annunciated in both the central and secondary alarm stations.

ITAAC Completion Description

An inspection of the as-built vital areas, and central and secondary alarm stations is performed to confirm the Vogtle Electric Generating Plant (VEGP) Unit 3 [Unit 4] vital areas are locked and alarmed with active intrusion detection systems and intrusion is detected and annunciated in both the central alarm station (CAS) and secondary alarm station (SAS), and satisfy the applicable vital area access control requirements of the VEGP Unit 3 and Unit 4 Physical Security Plan associated with 10 CFR 73.55(e)(9)(iii). The VEGP Unit 3 [Unit 4] Plant Security System ITAACs only cover the Unit 3 [Unit 4] plant security system design commitment scope.

A walkdown inspection of the as-built vital area portals is performed in accordance with Procedure XXX (Reference 1) and visually confirms that each VEGP Unit 3 [Unit 4] vital area portal has active intrusion detection equipment and locking devices installed per approved design specifications, and that the vital area portal is locked. The inspection then requires observation that when each vital area portal intrusion device is activated (e.g., unlocking via key, latch or crash bar and opening the portal door(s), unlocking via security badge and opening and holding the portal door open (time-out alarm), etc.) the intrusion detection device actuation is detected and alarmed in both the CAS and SAS. Lastly, the inspection confirms that each CAS and SAS intrusion detection alarm resets once the associated portal door(s) is closed and locked.

Reference 1 confirms that each vital area portal has active intrusion detection equipment and locking devices installed per approved design specifications and that the vital area portal is locked, intrusion detection device activation is detected and annunciated in both CAS and SAS for each vital area portal intrusion detection device, and each CAS and SAS intrusion detection alarm resets once the associated portal door(s) is closed and locked.

Reference 1 is available for NRC inspection as part of the Unit 3 (Unit 4) ITAAC 3.3.00.17 Completion Package (Reference 2 [3]).

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. Procedure XXX, Unit 3 [Unit 4] Vital Area Portal Inspections
2. 3.3.00.17-U3-CP-Rev 0, ITAAC Completion Package
3. 3.3.00.17-U4-CP-Rev 0, ITAAC Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"