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52-026

ND-19-0124
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 2.6.09.13c [Index Number 654]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of February 19, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.6.09.13c [Index Number 654] 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 2.6.09.13c [Index Number 654]

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**Southern Nuclear Operating Company
ND-19-0124
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 & Unit 4
Completion Plan for Uncompleted ITAAC 2.6.09.13c [Index Number 654]**

ITAAC Statement

Design Commitment

13.c) Non-portable communication equipment in the central and secondary alarm stations remains operable from an independent power source in the event of loss of normal power.

Inspections/Tests/Analyses

Tests, inspections, or a combination of tests and inspections of the non-portable communications equipment will be performed.

Acceptance Criteria

Non-portable communication devices (including conventional telephone systems) in the central and secondary alarm stations are wired to an independent power supply that enables the system to remain operable in the event of loss of normal power.

ITAAC Completion Description

A test of the non-portable communications equipment in the Vogtle Electric Generating Plant (VEGP) Unit 3 & 4 central alarm station (CAS) and secondary alarm station (SAS) is performed to confirm the non-portable communication devices (including conventional telephone systems) in the Unit 3 & 4 CAS and SAS are wired to an independent power supply that enables the system to remain operable in the event of loss of normal power, and satisfy the applicable CAS and SAS non-portable communications equipment power supply requirements of the VEGP Unit 3 and Unit 4 Physical Security Plan associated with 10 CFR 73.55(j)(5). The VEGP Unit 3 (Unit 4) Plant Security System ITAACs only cover the Unit 3 (Unit 4) plant security system design commitment scope.

The CAS and SAS are common to both VEGP Unit 3 and Unit 4. Testing is performed per Procedure XXX (Reference 1) and involves securing the normal power supply to the CAS and SAS non-portable communication devices, and then verifying that the power supply to the CAS and SAS non-portable communication devices transfers to an independent power supply such that the associated system remains operable in the event of loss of normal power. The non-portable communication devices included in the scope of this testing include the CAS/SAS conventional and dedicated telephones, CAS/SAS plant paging station, CAS/SAS security base station radio and CAS/SAS security intercom station.

The testing performed in Reference 1 confirms that the non-portable communication devices (including conventional telephone systems) in the Unit 3 & 4 CAS and SAS are wired to an independent power supply that enables the system to remain operable in the event of loss of normal power.

Reference 1 is available for NRC inspection as part of the Unit 3 (Unit 4) ITAAC 2.6.09.13c 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 & 4 CAS/SAS Non-portable Communication Devices Independent Power Supply Test
2. 2.6.09.13c-U3-CP-Rev 0, ITAAC Completion Package
3. 2.6.09.13c-U4-CP-Rev 0, ITAAC Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"