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ND-19-0205
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 2.3.03.04 [Index Number 324]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of February 27, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.3.03.04 [Index Number 324] 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 2.3.03.04 [Index Number 324]

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**Southern Nuclear Operating Company
ND-19-0205
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.3.03.04 [Index Number 324]**

ITAAC Statement

Design Commitment

4. Controls exist in the MCR to cause the components identified in Table 2.3.3-1 to perform the listed function.

5. Displays of the parameters identified in Table 2.3.3-1 can be retrieved in the MCR.

Inspections, Tests, Analyses

Testing will be performed on the components in Table 2.3.3-1 using controls in the MCR.

Inspection will be performed for retrievability of parameters in the MCR.

Acceptance Criteria

Controls in the MCR operate to cause the components listed in Table 2.3.3-1 to perform the listed functions.

The displays identified in Table 2.3.3-1 can be retrieved in the MCR.

ITAAC Completion Description

Tests and inspections are performed to ensure controls exist in the Main Control Room (MCR) to cause the components identified in Combined License (COL) Table 2.3.3-1 (Attachment A) to perform the listed functions and to verify the displays of the parameters listed in Attachment A can be retrieved in the MCR.

Controls in the MCR operate to cause the components listed in Table 2.3.3-1 to perform the listed functions.

Testing is performed in accordance with Unit 3 and Unit 4 component test package work orders (References 1 and 2, respectively) to verify controls in the MCR operate to cause the components listed in COL Appendix C Table 2.3.3-1 (Attachment A) to perform the listed functions. At an MCR operator workstation, the Standby Diesel Fuel Oil System (DOS) is verified to be in standby, then the DOS Fuel Oil Pumps (DOS-MP-01A and DOS-MP-01B) are started using Plant Control System controls from the MCR. Local inspection verifies pump start status and is documented in the test.

Unit 3 and Unit 4 component test results (References 1 and 2, respectively) confirm that controls in the MCR operate to cause the components listed in Table 2.3.3-1 to perform the listed functions.

The displays identified in Table 2.3.3-1 can be retrieved in the MCR.

The inspection is performed in accordance with the Unit 3 and Unit 4 component test package work orders (References 1 and 2, respectively) for DOS component indication verifications, and visually confirms that when each of the displays of parameters identified in Attachment A is

summoned at an MCR workstation, the summoned plant parameter appears on a display monitor at that MCR workstation.

The Unit 3 and Unit 4 component test results (References 1 and 2, respectively) confirm that the VEGP Unit 3 and Unit 4 plant parameter displays identified in Attachment A can be retrieved in the MCR.

References 1 and 2 are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.3.03.04 Completion Packages (References 3 and 4, respectively).

List of ITAAC Findings

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company performed a review of all ITAAC findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant findings associated with the ITAAC.

References (available for NRC inspection)

1. SNC921153, "Standby Diesel Fuel Oil System Indication and Control Function Verifications – ITAAC: SV3-2.3.03.04 Items 4 & 5"
2. SNCXXXXX, "Standby Diesel Fuel Oil System Indication and Control Function Verifications – ITAAC: SV4-2.3.03.04 Items 4 & 5"
3. 2.3.03.04-U3-CP-Rev 0, ITAAC Completion Package
4. 2.3.03.04-U4-CP-Rev 0, ITAAC Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A

Table 2.3.3-1			
Equipment Name	Tag No.	Display	Control Function
Diesel Fuel Oil Pump 1A (Motor)	DOS-MP-01A	Yes (Run Status)	Start
Diesel Fuel Oil Pump 1B (Motor)	DOS-MP-01B	Yes (Run Status)	Start
Diesel Generator Fuel Oil Day Tank A Level	DOS-016A	Yes	-
Diesel Generator Fuel Oil Day Tank B Level	DOS-016B	Yes	-

Note: Dash (-) indicates not applicable.