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Docket Nos.: 52-025  
52-026ND-19-0223  
10 CFR 52.99(c)(3)U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555-0001Southern Nuclear Operating Company  
Vogtle Electric Generating Plant Unit 3 and Unit 4  
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load  
Item 2.3.10.12 [Index Number 879]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of March 1, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.3.10.12 [Index Number 879] 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 & 4Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.3.10.12 [Index Number 879]

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**Southern Nuclear Operating Company  
ND-19-0223  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.3.10.12 [Index Number 879]**

## **ITAAC Statement**

### **Design Commitment**

12. Safety-related displays identified in Table 2.3.10-1 can be retrieved in the main control room (MCR).

### **Inspections, Tests, Analyses**

Inspection will be performed for retrievability of the safety-related displays in the MCR.

### **Acceptance Criteria**

Safety-related displays identified in Table 2.3.10-1 can be retrieved in the MCR.

## **ITAAC Completion Description**

An inspection is performed to verify the retrievability of the Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 safety-related displays in the MCR. The inspection for retrievability confirms that the safety-related displays of the parameters identified in COL Appendix C Table 2.3.10-1 (Attachment A) can be retrieved in the MCR.

The inspection is performed in accordance the Unit 3 and Unit 4 component test package work orders (References 1 and 2, respectively) for Liquid Radwaste System (WLS) component indication verifications, and visually confirms that when each of the safety-related displays identified in Attachment A is summoned at the MCR Protection and Safety Monitoring System (PMS) Visual Display Units (VDUs), the summoned safety-related display appears on the PMS VDU.

The Unit 3 and Unit 4 component test results (References 1 and 2, respectively) confirm that the VEGP Unit 3 and Unit 4 safety-related displays listed 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 2.3.10.12 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. SNC922147, "WLS Verifications – ITAAC: SV3-2.3.10.07a.ii Items 7.a.i, 8, 10 and SV3-2.3.10.12"
2. SNCXXXXX, "WLS Verifications – ITAAC: SV4-2.3.10.07a.ii Items 7.a.i, 8, 10 and SV4-2.3.10.12"
3. 2.3.10.12-U3-CP-Rev 0, ITAAC Completion Package
4. 2.3.10.12-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**

Excerpt from Combined License Appendix C Table 2.3.10-1

<b>Table 2.3.10-1</b>		
<b>Equipment Name</b>	<b>Tag No.</b>	<b>Safety-Related Display</b>
WLS Auxiliary Building Radiologically Controlled Area (RCA) Floodup Level Sensor	WLS-400A	Yes
WLS Auxiliary Building RCA Floodup Level Sensor	WLS-400B	Yes