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52-026

ND-19-0681  
10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission  
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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 2.5.02.05a [Index Number 527]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of June 5, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.5.02.05a [Index Number 527] 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 2.5.02.05a [Index Number 527]

MJY/RLB/sfr

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**Southern Nuclear Operating Company  
ND-19-0681  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.5.02.05a [Index Number 527]**

## **ITAAC Statement**

### **Design Commitment**

5.a) The Class 1E equipment, identified in Table 2.5.2-1, is powered from its respective Class 1E division.

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

Tests will be performed by providing a simulated test signal in each Class 1E division.

### **Acceptance Criteria**

A simulated test signal exists at the Class 1E equipment identified in Table 2.5.2-1 when the assigned Class 1E division is provided the test signal.

## **ITAAC Completion Description**

Testing is performed on the Class 1E equipment identified in the VEGP Unit 3 and Unit 4 COL Appendix C Table 2.5.2-1 (Attachment A) to demonstrate the equipment is powered from its respective Class 1E division. This ITAAC performs testing on the equipment in Attachment A by providing a simulated test signal in each Class 1E division.

Unit 3 and Unit 4 component test package work orders SNC921602 and SNCXXXXXX (References 1 and 2, respectively) document completion of power verification activities for the equipment identified in Attachment A. References 1 and 2 first verify that power supply cables/wiring are installed and terminated from the applicable Class 1E division distribution panel power supply to the equipment identified in Attachment A using approved construction drawings and cable/wiring termination documentation. References 1 and 2 then confirm, via cable/wiring termination inspection documentation, that continuity testing is performed on each of the installed cables/wiring to confirm current flow within the installed cable/wiring. The combination of cable/wiring installation and termination verification, with the installed cable/wiring continuity testing, confirms that the equipment identified in Appendix A is powered from its respective Class 1E division.

The Unit 3 and Unit 4 component test package work orders (References 1 and 2, respectively) confirm that a simulated test signal exists at the Class 1E equipment identified in Table 2.5.2-1 when the assigned Class 1E division is provided the test signal.

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

## **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. SNC921602, "PMS Component Power Verification Test – ITAAC: SV3-2.5.02.05a"
2. SNCXXXXXX, "PMS Component Power Verification Test – ITAAC: SV4-2.5.02.05a"
3. 2.5.02.05a-U3-CP-Rev 0, ITAAC Completion Package
4. 2.5.02.05a-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**

COL Appendix C Table 2.5.2-1

<b>Equipment Name*</b>	<b>Class 1E*</b>
PMS Cabinets, Division A	Yes
PMS Cabinets, Division B	Yes
PMS Cabinets, Division C	Yes
PMS Cabinets, Division D	Yes
Reactor Trip Switchgear, Division A	Yes
Reactor Trip Switchgear, Division B	Yes
Reactor Trip Switchgear, Division C	Yes
Reactor Trip Switchgear, Division D	Yes
MCR/RSW Transfer Panels	Yes
MCR Safety-related Display, Division A	Yes
MCR Safety-related Display, Division B	Yes
MCR Safety-related Display, Division C	Yes
MCR Safety-related Display, Division D	Yes
MCR Safety-related Controls	Yes

\* Excerpted from COL Appendix C Table 2.5.2-1