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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 2.3.10.07a.ii [Index Number 444]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of June 20, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) 2.3.10.07a.ii [Index Number 444] 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,

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Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.3.10.07a.ii [Index Number 444]

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Southern Nuclear Operating Company
ND-19-0744
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Completion Plan for Uncompleted ITAAC 2.3.10.07a.ii [Index Number 444]

ITAAC Statement

Design Commitment:

7.a) The WLS provides the nonsafety-related function of detecting leaks within containment to the containment sump.

7.b) The WLS provides the nonsafety-related function of controlling releases of radioactive materials in liquid effluents.

8. Controls exist in the MCR to cause the remotely operated valve identified in Table 2.3.10-3 to perform its active function.

9. The check valves identified in Table 2.3.10-1 perform an active safety-related function to change position as indicated in the table.

10. Displays of the parameters identified in Table 2.3.10-3 can be retrieved in the MCR.

Inspection, Tests, Analyses:

i) Inspection will be performed for retrievability of the displays of containment sump level channels WLS-034, WLS-035, and WLS-036 in the MCR.

ii) Testing will be performed by adding water to the sump and observing display of sump level.

Tests will be performed to confirm that a simulated high radiation signal from the discharge radiation monitor, WLS-RE-229, causes the discharge isolation valve WLS-PL-V223 to close.

Stroke testing will be performed on the remotely operated valve listed in Table 2.3.10-3 using controls in the MCR.

Exercise testing of the check valves with active safety functions identified in Table 2.3.10-1 will be performed under pre-operational test pressure, temperature and flow conditions.

Inspection will be performed for retrievability of the displays identified in Table 2.3.10-3 in the MCR.

Acceptance Criteria:

i) Nonsafety-related displays of WLS containment sump level channels WLS-034, WLS-035, and WLS-036 can be retrieved in the MCR.

ii) A report exists and concludes that sump level channels WLS-034, WLS-035, and WLS-036 can detect a change of 1.34 ± 0.5 inches.

A simulated high radiation signal causes the discharge control isolation valve WLS-PL-V223 to close.

Controls in the MCR operate to cause the remotely operated valve to perform its active function.

Each check valve changes position as indicated on Table 2.3.10-1.

Displays identified in Table 2.3.10-3 can be retrieved in the MCR.

ITAAC Completion Description

Multiple ITAAC are performed to verify the Liquid Radwaste System (WLS) provides the nonsafety-related function of detecting leaks within containment to the containment sump by inspecting for the retrievability of the containment sump level channels in the MCR and testing to demonstrate that the containment sump level instruments can detect and display a sump level change of 1.34 ±0.5 inches. This ITAAC also confirms that the WLS provides the nonsafety-related function of controlling the release of radioactive materials in liquid effluents by testing to ensure the discharge control valve WLS-PL-V223 closes when a high radiation signal is simulated. This ITAAC ensures controls exist and operate in the Main Control Room (MCR) to cause the remotely operated valve in Combined License (COL) Appendix C Table 2.3.10-3 (Attachment C) to perform the active function and that the check valves in COL Table 2.3.10-1 (Attachment A) perform their active function to change position as listed in the table. Additionally, an inspection is performed to ensure the displays of the parameters identified in COL Table 2.3.10-3 (Attachment B) can be retrieved in the MCR.

i) Nonsafety-related displays of WLS containment sump level channels WLS-034, WLS-035, and WLS-036 can be retrieved in the MCR.

An inspection is performed for Unit 3 and Unit 4 in accordance with component test packages SNC922147 and SNCXXXXXX (References 1 and 2). These component test packages verify the nonsafety-related displays of WLS containment sump level channels WLS-034, WLS-035, and WLS-036 can be retrieved in the MCR.

References 1 and 2 direct the retrieval of the containment sump level indicating channels (WLS-034, WLS-035, and WLS-036) from an MCR console, verifies and documents the indication is displayed.

The results of this inspection confirm that for Unit 3 and Unit 4 the nonsafety-related displays of WLS containment sump level channels WLS-034, WLS-035, and WLS-036 can be retrieved in the MCR.

ii) A report exists and concludes that sump level channels WLS-034, WLS-035, and WLS-036 can detect a change of 1.34 ± 0.5 inches.

Testing is performed for Unit 3 and Unit 4 in accordance with preoperational test procedures 3-WLS-ITPP-501 and 4-WLS-ITPP-501 (References 3 and 4) to verify that sump level channels WLS-034, WLS-035, and WLS-036 can detect a change of 1.34 ± 0.5 inches.

Testing using references 3 and 4 commences by recording the initial sump level measurement locally and using WLS-034 indication in the MCR. A demineralized water source is used to increase the containment sump level by 1.34 inches as measured locally. The local level is compared to WLS-034 indication in the MCR and the difference is verified to be ≤ 0.5 inches. This verifies WLS-034 can detect a change in containment sump level of 1.34 inches ± 0.5 inches. This testing is repeated for the remaining containment sump level channels WLS-035 and WLS-036.

The completed test results reports demonstrate that, for Unit 3 and Unit 4, a report exists and concludes sump level channels WLS-034, WLS-035, and WLS-036 can detect a change of 1.34 ± 0.5 inches.

A simulated high radiation signal causes the discharge control isolation valve WLS-PL-V223 to close.

Testing is performed for Unit 3 and Unit 4 in accordance with component test packages SNCXXXXXX and SNCYYYYYY (References 5 and 6) to verify that a simulated high radiation signal causes the discharge control isolation valve WLS-PL-V223 to close.

Testing is performed in accordance with the Unit 3 and Unit 4 component test packages SNCXXXXXX and SNCYYYYYY (References 5 and 6), by verifying WGS-PL-V223 is initially open. The test simulates a high radiation signal from the discharge radiation monitor, WGS-PL-V223 is verified to close on the Plant Control System (PLS) monitor in the Main Control Room and verification is documented in the component test package.

This testing verifies that for Unit 3 and Unit 4 a simulated high radiation signal causes the discharge control isolation valve WGS-PL-V223 to close.

Controls in the MCR operate to cause the remotely operated valve to perform its active function.

Testing is performed for Unit 3 and Unit 4 in accordance with component test packages SNC922147 and SNCXXXXXX (References 1 and 2) to verify that controls in the MCR operate to cause the remotely operated valve (Attachment C) to perform its active function.

Testing commences using references 1 and 2 at one of the MCR consoles. WLS-PL-V223 is opened using Plant Control System (PLS) controls, verified to be open locally, closed using PLS controls and verified to be closed locally.

The results of this testing confirm that for Unit 3 and Unit 4, the controls in the MCR operate to cause the remotely operated valve to perform its active function

Each check valve changes position as indicated on Table 2.3.10-1.

Testing is performed for Unit 3 and Unit 4 in accordance with preoperational test procedures 3-WLS-ITPP-501 and 4-WLS-ITPP-501 (References 3 and 4) to verify each check valve changes position as indicated on Attachment A.

References 3 and 4 verify that the performance of 3/4-WLS-OTS-10-001 (References 7 and 8) have been completed for the liquid radwaste system check valves. The check valve testing begins by pouring water into the Chemical and Volume Control System (CVS) compartment floor drain and verifying the proper level rise in the containment sump. This verifies that the drain line check valves (WLS-V071A and V072A) partially opened. Then a blank flange is installed downstream of both check valves, test connection caps are removed, and an air hose with an inline flowmeter and pressure gauge is connected to the test connection between the blank flange and WLS-V072A. The line is pressurized and when flowrate has stabilized, the pressure and leakage are recorded. The flow rate is verified to be < .25 scfm and this verifies that check valve WLS-V072A has closed. The air hose is then moved to the test connection between the two check valves and pressurized. When the pressure and flowrate stabilize, pressure and flowrate are recorded. The flow rate is verified to be < .25 scfm and this verifies that check valve WLS-V071A has closed. This methodology is repeated for the two remaining

drain lines and associated check valves. This testing is depicted in Piping and Instrumentation Diagram, Liquid Radwaste System WLS-M6-001.

The completed test results verify for Unit 3 and Unit 4 that each check valve changes position as indicated on Table 2.3.10-1.

Displays identified in Table 2.3.10-3 can be retrieved in the MCR.

An inspection is performed for Unit 3 and Unit 4 in accordance with component test packages SNC922147 and SNCXXXXXX (References 1 and 2). These component test packages verify the displays identified in Attachment B can be retrieved in the MCR.

References 1 and 2 direct the retrieval of the displays identified in Attachment B from an MCR console, verifies and documents the indication is displayed.

The completed Unit 3 and Unit 4 component test results (References 1 and 2) confirm that the displays identified in Table 2.3.10-3 can be retrieved in the MCR.

References 1 through 8 are available for NRC inspection as part of the ITAAC 2.3.10.07a.ii Completion Packages (Reference 9 and 10).

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. SNC922147, "WLS Verifications – ITAAC: SV3-2.3.10.07a.ii Items 7.a.i, 8, 10 and SV3-2.3.10.12"
2. SNCXXXXXX, " WLS Verifications – ITAAC: SV4-2.3.10.07a.ii Items 7.a.i, 8, 10 and SV4-2.3.10.12"
3. 3-WLS-ITPP-501, "Liquid Radwaste System Acceptance Test"
4. 4-WLS-ITPP-501, "Liquid Radwaste System Acceptance Test"
5. SNCXXXXXX, "Liquid Radwaste System Verification ITAAC: SV3-ITAAC-ST-2.3.10.07a.ii Item: 7.b"
6. SNCYYYYYY, "Liquid Radwaste System Verification ITAAC: SV4-ITAAC-ST-2.3.10.07a.ii Item: 7.b"
7. 3-WLS-OTS-10-001, "Liquid Radwaste System Check Valve Exercise Test"
8. 4-WLS-OTS-10-001, "Liquid Radwaste System Check Valve Exercise Test"
9. 2.3.10.07a.ii-U3-CP-Rev0, ITAAC Completion Package
10. 2.3.10.07a.ii-U4-CP-Rev0, ITAAC Completion Package
11. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A

*Excerpt of COL Appendix C Table 2.3.10-1

*Equipment Name	*Tag No.	*Active Function
WLS Drain from Passive Core Cooling System (PXS) Compartment A (Room11206) Check Valve	WLS-PL-V071B	Transfer Closed
WLS Drain from PXS Compartment A (Room 11206) Check Valve	WLS-PL-V072B	Transfer Closed
WLS Drain from PXS Compartment B (Room 11207) Check Valve	WLS-PL-V071C	Transfer Closed
WLS Drain from PXS Compartment B (Room 11207) Check Valve	WLS-PL-V072C	Transfer Closed
WLS Drain from Chemical and Volume Control System (CVS) Compartment (Room 11209) Check Valve	WLS-PL-V071A	Transfer Closed
WLS Drain from CVS Compartment (Room 11209) Check Valve	WLS-PL-V072A	Transfer Closed

Attachment B

*Excerpt of COL Appendix C Table 2.3.10-3

*Equipment Name	*Tag No.	*Display
Reactor Coolant Drain Tank Level	WLS-JE-LT002	Yes
Letdown Flow from CVS to WLS	WLS-JE-FT020	Yes
WLS Auxiliary Building RCA Floodup Level Sensor	WLS-400A	Yes
WLS Auxiliary Building RCA Floodup Level Sensor	WLS-400B	Yes

Attachment C

*Excerpt of COL Appendix C Table 2.3.10-3

*Equipment Name	*Tag No.	*Active Function
WLS Effluent Discharge Isolation Valve	WLS-PL-V223	Close