Southern Nuclear

Michael J. Yox
Regulatory Affairs Director
Vogtle 3 & 4

7825 River Road
Waynesboro, GA 30830
706-848-6459 tel

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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 2.2.03.07b [Index Number 172]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of August 8, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.03.07b [Index Number 172] 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,

Kellie Reeds for MJY

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 2.2.03.07b [Index Number 172]

MJY/RLB/sfr

To:

Southern Nuclear Operating Company/ Georgia Power Company
Mr. P. P. Sena III (w/o enclosures)
Mr. D. L. McKinney (w/o enclosures)
Mr. M. D. Meier (w/o enclosures)
Mr. D. H. Jones (w/o enclosures)
Mr. G. Chick
Mr. M. J. Yox
Mr. A. S. Parton
Ms. K. A. Roberts
Mr. T. G. Petrak
Mr. C. T. Defnall
Mr. C. E. Morrow
Mr. J. L. Hughes
Ms. K. M. Stacy
Ms. A. C. Chamberlain
Mr. J. C. Haswell
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cc:

Nuclear Regulatory Commission
Mr. W. Jones (w/o enclosures)
Mr. F. D. Brown
Mr. C. P. Patel
Mr. G. J. Khouri
Ms. S. E. Temple
Mr. N. D. Karlovich
Mr. A. Lerch
Mr. C. J. Even
Mr. B. J. Kemker
Ms. N. C. Coovert
Mr. C. Welch
Mr. J. Gaslevic
Mr. V. Hall
Mr. G. Armstrong
Ms. T. Lamb
Mr. M. Webb
Mr. T. Fredette
Mr. C. Weber

Oglethorpe Power Corporation
Mr. R. B. Brinkman
Mr. E. Rasmussen

Municipal Electric Authority of Georgia
Mr. J. E. Fuller
Mr. S. M. Jackson

Dalton Utilities
Mr. T. Bundros

Westinghouse Electric Company, LLC
Dr. L. Oriani (w/o enclosures)
Mr. D. C. Durham (w/o enclosures)
Mr. M. M. Corletti
Ms. L. G. Iller
Mr. Z. S. Harper
Mr. J. L. Coward

Other
Mr. J. E. Hesler, *Bechtel Power Corporation*
Ms. L. Matis, *Tetra Tech NUS, Inc.*
Dr. W. R. Jacobs, Jr., Ph.D., *GDS Associates, Inc.*
Mr. S. Roetger, *Georgia Public Service Commission*
Ms. S. W. Kernizan, *Georgia Public Service Commission*
Mr. K. C. Greene, *Troutman Sanders*
Mr. S. Blanton, *Balch Bingham*

Southern Nuclear Operating Company
ND-19-0614
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Completion Plan for Uncompleted ITAAC 2.2.03.07b [Index Number 172]

ITAAC Statement

Design Commitment

7.b) The Class 1E components identified in Table 2.2.3-1 are powered from their respective Class 1E division.

Inspections/Tests/Analyses

Testing 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 2.2.3-1 when the assigned Class 1E division is provided the test signal.

ITAAC Completion Description

Testing is performed on the Class 1E components (equipment) identified in the VEGP Unit 3 and Unit 4 COL Appendix C Table 2.2.3-1 (Attachment A) to demonstrate they are powered from their respective Class 1E division. This ITAAC performs testing on the Passive Core Cooling System (PXS) equipment identified in Table 2.2.3-1 by providing a simulated test signal in each Class 1E division.

Class 1E power verification testing of the Protection and Safety Monitoring System (PMS) cabinets, associated with the equipment identified in Attachment A, is verified through ITAAC 2.5.02.05a component testing (Reference 1) and confirms the PMS cabinets are powered from their respective Class 1E division. Unit 3 and Unit 4 component test package work orders SNC921610 and SNCXXXXXX (References 2 and 3, respectively) document completion of power verification activities from the PMS cabinets and the Class 1E power distribution panels/motor control centers to the equipment identified in Attachment A. References 2 and 3 first verify that power supply cables/wiring are installed and terminated from the applicable PMS cabinet and Class 1E power distribution panel/motor control center to the respective component identified in Attachment A using approved construction drawings and cable/wiring termination documentation. References 2 and 3 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 2 and 3, respectively) confirm that a simulated test signal exists at the Class 1E equipment identified in Table 2.2.3-1 when the assigned Class 1E division is provided the test signal.

References 2 and 3 are available for NRC inspection as part of Unit 3 and Unit 4 ITAAC Completion Packages (References 4 and 5).

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. ITAAC 2.5.02.05a Closure Notification
2. SNC921610, "PXS Component Power Verification Test – ITAAC: SV3-2.2.03.07b"
3. SNCXXXXXX, "PXS Component Power Verification Test – ITAAC: SV4-2.2.03.07b"
4. 2.2.03.07b-U3-CP-Rev0, ITAAC Completion Package
5. 2.2.03.07b-U4-CP-Rev0, ITAAC Completion Package
6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A

COL Appendix C Table 2.2.3-1

Equipment Name*	Tag No.*
CMT A Inlet Isolation Motor-operated Valve	PXS-PL-V002A
CMT B Inlet Isolation Motor-operated Valve	PXS-PL-V002B
CMT A Discharge Isolation Valve	PXS-PL-V014A
CMT B Discharge Isolation Valve	PXS-PL-V014B
CMT A Discharge Isolation Valve	PXS-PL-V015A
CMT B Discharge Isolation Valve	PXS-PL-V015B
Nitrogen Supply Containment Isolation Valve	PXS-PL-V042
PRHR HX Inlet Isolation Motor-operated Valve	PXS-PL-V101
PRHR HX Control Valve	PXS-PL-V108A
PRHR HX Control Valve	PXS-PL-V108B
Containment Recirculation A Isolation Motor-operated Valve	PXS-PL-V117A
Containment Recirculation B Isolation Motor-operated Valve	PXS-PL-V117B
Containment Recirculation A Squib Valve	PXS-PL-V118A
Containment Recirculation B Squib Valve	PXS-PL-V118B
Containment Recirculation A Squib Valve	PXS-PL-V120A
Containment Recirculation B Squib Valve	PXS-PL-V120B
IRWST Injection A Squib Valve	PXS-PL-V123A
IRWST Injection B Squib Valve	PXS-PL-V123B
IRWST Injection A Squib Valve	PXS-PL-V125A
IRWST Injection B Squib Valve	PXS-PL-V125B
IRWST Gutter Isolation Valve	PXS-PL-V130A

IRWST Gutter Isolation Valve	PXS-PL-V130B
CMT A Level Sensor	PXS-011A
CMT A Level Sensor	PXS-011B
CMT A Level Sensor	PXS-011C
CMT A Level Sensor	PXS-011D
CMT B Level Sensor	PXS-012A
CMT B Level Sensor	PXS-012B
CMT B Level Sensor	PXS-012C
CMT B Level Sensor	PXS-012D
CMT A Level Sensor	PXS-013A
CMT A Level Sensor	PXS-013B
CMT A Level Sensor	PXS-013C
CMT A Level Sensor	PXS-013D
CMT B Level Sensor	PXS-014A
CMT B Level Sensor	PXS-014B
CMT B Level Sensor	PXS-014C
CMT B Level Sensor	PXS-014D
IRWST Wide Range Level Sensor	PXS-046
IRWST Wide Range Level Sensor	PXS-047
IRWST Wide Range Level Sensor	PXS-048
PRHR HX Flow Sensor	PXS-049A
PRHR HX Flow Sensor	PXS-049B
Containment Flood-up Level Sensor	PXS-050
Containment Flood-up Level Sensor	PXS-051

Containment Flood-up Level Sensor	PXS-052
IRWST Lower Narrow Range Level Sensor	PXS-066
IRWST Lower Narrow Range Level Sensor	PXS-067
IRWST Lower Narrow Range Level Sensor	PXS-068
IRWST Lower Narrow Range Level Sensor	PXS-069

* Excerpted from COL Appendix C Table 2.2.3-1