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52-026

ND-19-0979  
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 2.1.02.07b [Index Number 26]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of August 7, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.1.02.07b [Index Number 26] 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 2.1.02.07b [Index Number 26]

MJY/RLB/sfr

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**Southern Nuclear Operating Company  
ND-19-0979  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.1.02.07b [Index Number 26]**

## **ITAAC Statement**

### **Design Commitment**

7.b) The Class 1E components identified in Table 2.1.2-1 are powered from their respective Class 1E division.

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

Testing will be performed on the RCS 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 2.1.2-1 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 2.1.2-1 (Attachment A) to demonstrate they are powered from their respective Class 1E division. This ITAAC performs testing on the Reactor Coolant System (RCS) equipment identified in Table 2.1.2-1 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 SNC921640 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 2.1.2-1 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. SNC921640, "RCS Component Power Verification Test – ITAAC: SV3-2.1.02.07b"
3. SNCXXXXXX, "RCS Component Power Verification Test – ITAAC: SV4-2.1.02.07b"
4. 2.1.02.07b-U3-CP-Rev0, ITAAC Completion Package
5. 2.1.02.07b-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 2.1.2-1

<b>Equipment Name*</b>	<b>Tag No.*</b>
First-stage ADS Motor-operated Valve (MOV)	RCS-PL-V001A
First-stage ADS MOV	RCS-PL-V001B
Second-stage ADS MOV	RCS-PL-V002A
Second-stage ADS MOV	RCS-PL-V002B
Third-stage ADS MOV	RCS-PL-V003A
Third-stage ADS MOV	RCS-PL-V003B
Fourth-stage ADS Squib Valve	RCS-PL-V004A
Fourth-stage ADS Squib Valve	RCS-PL-V004B
Fourth-stage ADS Squib Valve	RCS-PL-V004C
Fourth-stage ADS Squib Valve	RCS-PL-V004D
First-stage ADS Isolation MOV	RCS-PL-V011A
First-stage ADS Isolation MOV	RCS-PL-V011B
Second-stage ADS Isolation MOV	RCS-PL-V012A
Second-stage ADS Isolation MOV	RCS-PL-V012B
Third-stage ADS Isolation MOV	RCS-PL-V013A
Third-stage ADS Isolation MOV	RCS-PL-V013B
Fourth-stage ADS MOV	RCS-PL-V014A
Fourth-stage ADS MOV	RCS-PL-V014B
Fourth-stage ADS MOV	RCS-PL-V014C
Fourth-stage ADS MOV	RCS-PL-V014D
Reactor Vessel Head Vent Valve	RCS-PL-V150A

Reactor Vessel Head Vent Valve	RCS-PL-V150B
Reactor Vessel Head Vent Valve	RCS-PL-V150C
Reactor Vessel Head Vent Valve	RCS-PL-V150D
RCS Hot Leg 1 Flow Sensor	RCS-101A
RCS Hot Leg 1 Flow Sensor	RCS-101B
RCS Hot Leg 1 Flow Sensor	RCS-101C
RCS Hot Leg 1 Flow Sensor	RCS-101D
RCS Hot Leg 2 Flow Sensor	RCS-102A
RCS Hot Leg 2 Flow Sensor	RCS-102B
RCS Hot Leg 2 Flow Sensor	RCS-102C
RCS Hot Leg 2 Flow Sensor	RCS-102D
RCS Cold Leg 1A Narrow Range Temperature Sensor	RCS-121A
RCS Cold Leg 1B Narrow Range Temperature Sensor	RCS-121B
RCS Cold Leg 1B Narrow Range Temperature Sensor	RCS-121C
RCS Cold Leg 1A Narrow Range Temperature Sensor	RCS-121D
RCS Cold Leg 2B Narrow Range Temperature Sensor	RCS-122A
RCS Cold Leg 2A Narrow Range Temperature Sensor	RCS-122B
RCS Cold Leg 2A Narrow Range Temperature Sensor	RCS-122C
RCS Cold Leg 2B Narrow Range Temperature Sensor	RCS-122D
RCS Cold Leg 1A Dual Range Temperature Sensor	RCS-125A
RCS Cold Leg 2A Dual Range Temperature Sensor	RCS-125B
RCS Cold Leg 1B Dual Range Temperature Sensor	RCS-125C
RCS Cold Leg 2B Dual Range Temperature Sensor	RCS-125D
RCS Hot Leg 1 Narrow Range Temperature Sensor	RCS-131A



RCS Hot Leg 2 Narrow Range Temperature Sensor	RCS-131B
RCS Hot Leg 1 Narrow Range Temperature Sensor	RCS-131C
RCS Hot Leg 2 Narrow Range Temperature Sensor	RCS-131D
RCS Hot Leg 1 Narrow Range Temperature Sensor	RCS-132A
RCS Hot Leg 2 Narrow Range Temperature Sensor	RCS-132B
RCS Hot Leg 1 Narrow Range Temperature Sensor	RCS-132C
RCS Hot Leg 2 Narrow Range Temperature Sensor	RCS-132D
RCS Hot Leg 1 Narrow Range Temperature Sensor	RCS-133A
RCS Hot Leg 2 Narrow Range Temperature Sensor	RCS-133B
RCS Hot Leg 1 Narrow Range Temperature Sensor	RCS-133C
RCS Hot Leg 2 Narrow Range Temperature Sensor	RCS-133D
RCS Hot Leg 1 Wide Range Temperature Sensor	RCS-135A
RCS Hot Leg 2 Wide Range Temperature Sensor	RCS-135B
RCS Wide Range Pressure Sensor	RCS-140A
RCS Wide Range Pressure Sensor	RCS-140B
RCS Wide Range Pressure Sensor	RCS-140C
RCS Wide Range Pressure Sensor	RCS-140D
RCS Hot Leg 1 Level Sensor	RCS-160A
RCS Hot Leg 2 Level Sensor	RCS-160B
Passive Residual Heat Removal (PRHR) Return Line Temperature Sensor	RCS-161
Pressurizer Pressure Sensor	RCS-191A
Pressurizer Pressure Sensor	RCS-191B
Pressurizer Pressure Sensor	RCS-191C
Pressurizer Pressure Sensor	RCS-191D

Pressurizer Level Reference Leg Temperature Sensor	RCS-193A
Pressurizer Level Reference Leg Temperature Sensor	RCS-193B
Pressurizer Level Reference Leg Temperature Sensor	RCS-193C
Pressurizer Level Reference Leg Temperature Sensor	RCS-193D
Pressurizer Level Sensor	RCS-195A
Pressurizer Level Sensor	RCS-195B
Pressurizer Level Sensor	RCS-195C
Pressurizer Level Sensor	RCS-195D
RCP 1A Bearing Water Temperature Sensor	RCS-211A
RCP 1A Bearing Water Temperature Sensor	RCS-211B
RCP 1A Bearing Water Temperature Sensor	RCS-211C
RCP 1A Bearing Water Temperature Sensor	RCS-211D
RCP 1B Bearing Water Temperature Sensor	RCS-212A
RCP 1B Bearing Water Temperature Sensor	RCS-212B
RCP 1B Bearing Water Temperature Sensor	RCS-212C
RCP 1B Bearing Water Temperature Sensor	RCS-212D
RCP 2A Bearing Water Temperature Sensor	RCS-213A
RCP 2A Bearing Water Temperature Sensor	RCS-213B
RCP 2A Bearing Water Temperature Sensor	RCS-213C
RCP 2A Bearing Water Temperature Sensor	RCS-213D
RCP 2B Bearing Water Temperature Sensor	RCS-214A
RCP 2B Bearing Water Temperature Sensor	RCS-214B
RCP 2B Bearing Water Temperature Sensor	RCS-214C
RCP 2B Bearing Water Temperature Sensor	RCS-214D

RCP 1A Pump Speed Sensor	RCS-281
RCP 1B Pump Speed Sensor	RCS-282
RCP 2A Pump Speed Sensor	RCS-283
RCP 2B Pump Speed Sensor	RCS-284

\* Excerpted from COL Appendix C Table 2.1.2-1