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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 C.2.6.09.03b [Index Number 661]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of August 15, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item C.2.6.09.03b [Index Number 661] 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 & Unit 4
Completion Plan for Uncompleted ITAAC C.2.6.09.03b [Index Number 661]

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**Southern Nuclear Operating Company
ND-19-1004
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 & Unit 4
Completion Plan for Uncompleted ITAAC C.2.6.09.03b [Index Number 661]**

ITAAC Statement

Design Commitment

3.b) The isolation zones are monitored with intrusion detection equipment that provides the capability to detect and assess unauthorized persons.

4. The intrusion detection and assessment equipment at the protected area perimeter:

- a) detects penetration or attempted penetration of the protected area barrier and concurrently alarms in both the Central Alarm Station and Secondary Alarm Station;
- b) remains operable from an uninterruptible power supply in the event of the loss of normal power.

Inspections/Tests/Analyses

Inspections will be performed of the intrusion detection equipment within the isolation zones.

Tests, inspections or a combination of tests and inspections of the intrusion detection and assessment equipment at the protected area perimeter and its uninterruptible power supply will be performed.

Tests, inspections or a combination of tests and inspections of the intrusion detection and assessment equipment at the protected area perimeter and its uninterruptible power supply will be performed.

Acceptance Criteria

The isolation zones are equipped with intrusion detection equipment that provides the capability to detect and assess unauthorized persons.

The intrusion detection and assessment equipment at the protected area perimeter:

- a) detects penetration or attempted penetration of the protected area barrier and concurrently alarms in the Central Alarm Station and Secondary Alarm Station;
- b) remains operable from an uninterruptible power supply in the event of the loss of normal power.

ITAAC Completion Description

Inspection of the intrusion detection equipment within the protected area perimeter isolation zones is performed to verify that the isolation zones at the protected area perimeter are equipped with intrusion detection equipment that provides the capability to detect and assess unauthorized persons. Tests, inspections or a combination of tests and inspections of the intrusion detection and assessment equipment at the protected area perimeter and its uninterruptible power supply are also performed to verify the intrusion detection and assessment equipment at the protected area perimeter detects penetration or attempted penetration of the protected area barrier and concurrently alarms in the Central Alarm Station (CAS) and Secondary Alarm Station (SAS), and the intrusion detection and assessment equipment at the protected area perimeter remains operable from an uninterruptible power supply in the event of the loss of normal power. The VEGP Unit 3 (Unit 4) Plant Security System

ITAACs only cover the Unit 3 (Unit 4) plant security system design commitment scope. The CAS and SAS are common to both VEGP Unit 3 and Unit 4.

The isolation zones are equipped with intrusion detection equipment that provides the capability to detect and assess unauthorized persons.

An inspection is performed per Procedure XXX (Reference 1) to verify that the Unit 3 (Unit 4) protected area perimeter isolation zones are equipped with intrusion detection equipment that provides the capability to detect and assess unauthorized persons and satisfy the applicable intrusion detection and assessment requirements of the VEGP Units 3 and 4 Physical Security Plan associated with 10 CFR 73.55(i).

The inspection performs a walkdown of the Unit 3 (Unit 4) protected area perimeter isolation zones to confirm that the protected area perimeter isolation zones are equipped with intrusion detection equipment that is installed per approved construction drawings and provides the capability to detect and assess unauthorized persons.

The inspection results are documented in Reference 1 and verify that the Unit 3 (Unit 4) protected area perimeter isolation zones are equipped with intrusion detection equipment that provides the capability to detect and assess unauthorized persons.

The intrusion detection and assessment equipment at the protected area perimeter detects penetration or attempted penetration of the protected area barrier and concurrently alarms in the Central Alarm Station and Secondary Alarm Station.

Testing is performed per Procedure YYY (Reference 2) to verify that the intrusion detection and assessment equipment at the Unit 3 (Unit 4) protected area perimeter detects penetration or attempted penetration of the protected area barrier and concurrently alarms in the CAS and SAS and satisfy the applicable intrusion detection and assessment requirements of the VEGP Units 3 and 4 Physical Security Plan associated with 10 CFR 73.55(i).

Procedure YYY tests each segment of the Unit 3 (Unit 4) protected area perimeter intrusion detection system by crossing or disturbing the zone of detection and confirming that concurrent intrusion detection alarms are received in both the CAS and SAS. Procedure YYY then confirms that for each intrusion detection system alarm the security video system can provide video image recording with real-time display of video images and playback of recorded video images for assessment to both CAS and SAS.

The test results are documented in Reference 2 and verify that the intrusion detection and assessment equipment at the Unit 3 (Unit 4) protected area perimeter detects penetration or attempted penetration of the protected area barrier and concurrently alarms in the Central Alarm Station and Secondary Alarm Station.

The intrusion detection and assessment equipment at the protected area perimeter remains operable from an uninterruptible power supply in the event of the loss of normal power.

Testing is performed per Procedure ZZZ (Reference 3) to verify that the intrusion detection and assessment equipment at the Unit 3 (Unit 4) protected area perimeter remains operable from an uninterruptible power supply in the event of the loss of normal power and satisfy the applicable intrusion detection and assessment power supply requirements of the VEGP Units 3 and 4 Physical Security Plan associated with 10 CFR 73.55(i).

Procedure ZZZ (Reference 3) involves securing the assigned normal power supply to Unit 3 (Unit 4) intrusion detection and assessment equipment at the protected area perimeter and verifying that the protected area perimeter intrusion detection and assessment equipment remains powered from the credited uninterruptible power supply, such that the affected intrusion detection and assessment equipment remains operable.

The test results are documented in Reference 3 and verify that the intrusion detection and assessment equipment at the Unit 3 (Unit 4) protected area perimeter remains operable from an uninterruptible power supply in the event of the loss of normal power.

References 1, 2 and 3 are available for NRC inspection as part of the Unit 3 (Unit 4) ITAAC C.2.6.09.03b Completion Package (Reference 4 [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. Procedure XXX, Unit 3 (Unit 4) Isolation Zone Intrusion Detection Equipment Inspection
2. Procedure YYY, Unit 3 (Unit 4) Protected Area Perimeter Intrusion Detection Equipment Alarm and Assessment Test
3. Procedure ZZZ, Unit 3 (Unit 4) Intrusion Detection and Assessment Equipment Uninterruptible Power Supply Test
4. C.2.6.09.03b-U3-CP-Rev0, ITAAC Completion Package
5. C.2.6.09.03b-U4-CP-Rev0, ITAAC Completion Package
6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"