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52-026

ND-19-1030
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 2.6.09.05a [Index Number 644]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of September 3, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.6.09.05a [Index Number 644] 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 2.6.09.05a [Index Number 644]

MJY/RLB/sfr

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**Southern Nuclear Operating Company
ND-19-1030
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 & Unit 4
Completion Plan for Uncompleted ITAAC 2.6.09.05a [Index Number 644]**

ITAAC Statement

Design Commitment

5.a) Security alarm annunciation and video assessment information is displayed concurrently in the central alarm station and the secondary alarm station, and the video image recording with real time playback capability can provide assessment of activities before and after each alarm annunciation within the perimeter area barrier.

15.b) Intrusion detection and assessment systems concurrently provide visual displays and audible annunciation of alarms in the central and secondary alarm stations.

Inspections/Tests/Analyses

Test, inspection, or a combination of test and inspections of the installed systems will be performed.

Tests will be performed on intrusion detection and assessment equipment.

Acceptance Criteria

Security alarm annunciation and video assessment information is displayed concurrently in the central alarm station and the secondary alarm station, and the video image recording with real time playback capability provides assessment of activities before and after alarm annunciation within the perimeter barrier.

The intrusion detection system concurrently provides visual displays and audible annunciations of alarms in both the central and secondary alarm stations.

ITAAC Completion Description

Testing of the perimeter area barrier security alarm annunciation and video assessment systems is performed to verify that the security alarm annunciation and video assessment information is displayed concurrently in the Central Alarm Station (CAS) and the Secondary Alarm Station (SAS), and the video image recording with real time playback capability provides assessment of activities before and after alarm annunciation within the perimeter barrier. Testing also verifies that the intrusion detection system provides concurrent visual displays and audible annunciations of intrusion detection alarms in both the CAS and SAS. 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.

Security alarm annunciation and video assessment information is displayed concurrently in the central alarm station and the secondary alarm station, and the video image recording with real time playback capability provides assessment of activities before and after alarm annunciation within the perimeter barrier.

Tests are performed per Procedure XXX (Reference 1) to verify that Unit 3 (Unit 4) intrusion detection system perimeter area barrier alarms result in concurrent displays of security alarm annunciation and video assessment information in both the CAS and SAS, video image recording with real time playback capability provides assessment of activities before and after alarm annunciation within the perimeter barrier, and satisfy the applicable alarm annunciation

and video assessment requirements of the VEGP Units 3 and 4 Physical Security Plan associated with 10 CFR 73.55(i) and 10 CFR 73.55(e)(7)(i)(C).

Procedure XXX 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 displays of the security alarm annunciation and video assessment information are observed in both the CAS and SAS. Procedure XXX then confirms that for each perimeter barrier intrusion detection system alarm the security video assessment system provides video image recording with real-time display of video images to provide post-alarm activity assessment and playback of recorded video images for pre-alarm activity assessment to both CAS and SAS.

The test results are documented in Reference 1 and verify that the Unit 3 (Unit 4) security alarm annunciation and video assessment information is displayed concurrently in the central alarm station and the secondary alarm station, and the video image recording with real time playback capability provides assessment of activities before and after alarm annunciation within the perimeter barrier.

The intrusion detection system concurrently provides visual displays and audible annunciations of alarms in both the central and secondary alarm stations.

Testing is performed per Procedure YYY (Reference 2) to verify that Unit 3 (Unit 4) intrusion detection system alarms provide concurrent visual displays and audible annunciations of the alarms in both the CAS and SAS, and satisfy the applicable intrusion detection alarm requirements of the VEGP Units 3 and 4 Physical Security Plan associated with 10 CFR 73.55(i).

Procedure YYY tests the Unit 3 (Unit 4) intrusion detection system by initiating a security alarm signal for each intrusion detection device identified in the Vogtle Plant Security System Database (Reference 3) and confirming that, for each alarm signal, a concurrent visual display and audible annunciation of the alarm is observed in both CAS and SAS.

The test results are documented in Reference 2 and verify that the Unit 3 (Unit 4) intrusion detection system concurrently provides visual displays and audible annunciations of alarms in both the CAS and SAS.

Reference 2 is available for NRC inspection as part of the Unit 3 (Unit 4) ITAAC 2.6.09.05a 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) CAS/SAS Alarm Annunciation and Video Assessment Test
2. Procedure YYY, Unit 3 (Unit 4) CAS/SAS Intrusion Detection System Alarm Annunciation and Visual Display Test
3. SV0-SES-J0X-800000, Vogtle Plant Security System Database (SRI)
4. 2.6.09.05a-U3-CP-Rev0, ITAAC Completion Package
5. 2.6.09.05a-U4-CP-Rev0, ITAAC Completion Package
6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"