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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 2.2.01.07.ii [Index Number 108]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of September 18, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.01.07.ii [Index Number 108] 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.

Southern Nuclear Operating Company (SNC) previously submitted Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load for Item 2.2.01.07.ii [Index Number 108] ND-18-0663 [ML19249C320], dated September 6, 2019. This resubmittal supersedes ND-18-0663 in its entirety.

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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Southern Nuclear

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Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.2.01.07.ii [Index Number 108]

MJY/CWM/sfr

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**Southern Nuclear Operating Company  
ND-19-1140  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.2.01.07.ii [Index Number 108]**

## **ITAAC Statement**

### **Design Commitment**

7. The CNS provides the safety-related function of containment isolation for containment boundary integrity and provides a barrier against the release of fission products to the atmosphere.

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

ii) Testing will be performed to demonstrate that remotely operated containment isolation valves close within the required response times.

### **Acceptance Criteria**

ii) The containment purge isolation valves (VFS-PLV-003, -V004, -V009, and -V010) close within 10 seconds, containment vacuum relief isolation valves (VFS-PL-V800A and -V800B) close within 30 seconds, SGS valves SGS-PL-V040A/B and SGS-PL-V057A/B are covered in subsection 2.2.4, Table 2.2.4-4 (item 11.b.ii) and all other containment isolation valves close within 60 seconds upon receipt of an actuation signal.

## **ITAAC Completion Description**

Multiple ITAAC are performed to verify by tests that the Containment System (CNS) provides the safety-related function of containment isolation for containment boundary integrity and provides a barrier against the release of fission products to the atmosphere. Testing will be performed to demonstrate that remotely operated containment isolation valves close within the required response times. The containment purge isolation valves (VFS-PLV003, -V004, -V009, and -V010) close within 10 seconds, containment vacuum relief isolation valves (VFS-PL-V800A and -V800B) close within 30 seconds, SGS valves SGS-PL-V040A/B and SGS-PL-V057A/B are covered in the Combined License (COL) Appendix C subsection 2.2.4, Table 2.2.4-4 (item 11.b.ii) included in consolidated ITAAC Index 250 and all other containment isolation valves close within 60 seconds upon receipt of an actuation signal. The VEGP Unit 3 and 4 Updated Final Safety Analysis Report (UFSAR) Table 6.2.3-1 identifies all remotely operated containment isolation valves.

Testing is performed in accordance with Unit 3 and Unit 4 component test packages SNCXXXXXX and SNCYYYYYY (References 1 and 2). These component test packages utilize B-GEN-ITPCI-039 (Reference 3) to direct the performance of test procedures 3/4-CAS-OTS-10-001 (References 4 and 5), 3/4-CCS-OTS-10-001 (References 6 and 7), 3/4-GEN-OTS-10-001 (References 8 and 9), 3/4-GEN-OTS-10-002 (References 10 and 11), 3/4-GEN-OTS-10-003 (References 12 and 13), 3/4-GEN-OTS-10-004 (References 14 and 15), 3/4-RNS-OTS-17-004 (References 16 and 17), 3/4-SGS-OTS-10-003 (References 18 and 19), 3/4-SGS-OTS-10-004 (References 20 and 21), and 3/4-VWS-OTS-10-001 (References 22 and 23) to verify Containment isolation valve closure times.

References 4 through 23 establish initial conditions with each Containment isolation valve in the open position. An actuation signal is generated by Protection and Safety Monitoring System

(PMS) using the PMS Maintenance and Test Panel (MTP) to close each Containment isolation valve. Each Containment isolation valve closure is timed from the time the closed demand signal is generated until the valve is fully closed. The Containment isolation valve is verified locally closed by a person located at the valve.

The completed Unit 3 and Unit 4 component test results (References 1 and 2) confirm the containment purge isolation valves (VFS-PLV003, -V004, -V009, and -V010) close within 10 seconds, containment vacuum relief isolation valves (VFS-PL-V800A and -V800B) close within 30 seconds, SGS valves SGS-PL-V040A/B and SGS-PL-V057A/B are covered in COL Appendix C subsection 2.2.4, Table 2.2.4-4 (item 11.b.ii) and all other containment isolation valves close within 60 seconds upon receipt of an actuation signal as shown in Attachment A. Attachment A was generated to document the remotely operated containment isolation valves and the information contained in Attachment A was obtained from the VEGP Unit 3 and 4 Updated Final Safety Analysis Report (UFSAR) Table 6.2.3-1 and COL Appendix C.

References 1 and 2 are available for NRC inspection as part of ITAAC 2.2.01.07.ii Unit 3 and 4 Completion Packages (Reference 24 and 25).

### **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. SNCXXXXXX
2. SNCYYYYYY
3. B-GEN-ITPCI-039, "PMS CIM Component Test Procedure"
4. 3-CAS-OTS-10-001, "Compressed Air System Valve Stroke Test"
5. 4-CAS-OTS-10-001, "Compressed Air System Valve Stroke Test"
6. 3-CCS-OTS-10-001, "Component Cooling Water System Valve Stroke Test"
7. 4-CCS-OTS-10-001, "Component Cooling Water System Valve Stroke Test"
8. 3-GEN-OTS-10-001, "Division A Quarterly Valve Stroke Test"
9. 4-GEN-OTS-10-001, "Division A Quarterly Valve Stroke Test"
10. 3-GEN-OTS-10-002, "Division B Quarterly Valve Stroke Test"
11. 4-GEN-OTS-10-002, "Division B Quarterly Valve Stroke Test"
12. 3-GEN-OTS-10-003, "Division C Quarterly Valve Stroke Test"
13. 4-GEN-OTS-10-003, "Division C Quarterly Valve Stroke Test"
14. 3-GEN-OTS-10-004, "Division D Quarterly Valve Stroke Test"
15. 4-GEN-OTS-10-004, "Division D Quarterly Valve Stroke Test"
16. 3-RNS-OTS-17-004, "Normal Residual Heat Removal System Valve Stroke Test"
17. 4-RNS-OTS-17-004, "Normal Residual Heat Removal System Valve Stroke Test"
18. 3-SGS-OTS-10-003, "Steam Generating System Valve Stroke Test Train A Modes 3-6"
19. 4-SGS-OTS-10-003, "Steam Generating System Valve Stroke Test Train A Modes 3-6"
20. 3-SGS-OTS-10-004, "Steam Generating System Valve Stroke Test Train B Modes 3-6"
21. 4-SGS-OTS-10-004, "Steam Generating System Valve Stroke Test Train B Modes 3-6"
22. 3-VWS-OTS-10-001, "Central Chilled Water System Valve Stroke Test"

- 23. 4-VWS-OTS-10-001, "Central Chilled Water System Valve Stroke Test"
- 24. 2.2.01.07.ii-U3-CP-Rev 0, ITAAC Completion Package
- 25. 2.2.01.07.ii-U4-CP-Rev 0, ITAAC Completion Package
- 26. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"



**Attachment A**

<b>Equipment Name<sup>(1)</sup></b>	<b>Tag No.<sup>(2)</sup></b>	<b>Required Valve Closure Time<sup>(3)</sup> (seconds)</b>	<b>Actual Valve Closure Time (seconds)</b>	<b>Test Procedure</b>
Instrument Air Supply Outside Containment Isolation Valve	CAS-PL-V014	$\leq 60$ <sup>(1)</sup>		CAS-OTS-10-001
Component Cooling Water System (CCS) Containment Isolation Motor-operated Valve (MOV) – Inlet Line Outside Reactor Containment (ORC)	CCS-PL-V200	$\leq 60$ <sup>(1)</sup>		CCS-OTS-10-001
CCS Containment Isolation MOV – Outlet Line IRC	CCS-PL-V207	$\leq 60$ <sup>(1)</sup>		CCS-OTS-10-001
CCS Containment Isolation MOV – Outlet Line ORC	CCS-PL-V208	$\leq 60$ <sup>(1)</sup>		CCS-OTS-10-001
CVS Letdown Containment Isolation Valve	CVS-PL-V045	$\leq 60$ <sup>(1)</sup>		GEN-OTS-10-001
CVS Letdown Containment Isolation Valve	CVS-PL-V047	$\leq 60$ <sup>(1)</sup>		GEN-OTS-10-004
CVS Makeup Line Containment Isolation Motor-operated Valve	CVS-PL-V090	$\leq 60$ <sup>(1)</sup> ( $\leq 30$ ) <sup>(2)</sup>		GEN-OTS-10-004
CVS Makeup Line Containment Isolation Motor-operated Valve	CVS-PL-V091	$\leq 60$ <sup>(1)</sup> ( $\leq 30$ ) <sup>(2)</sup>		GEN-OTS-10-001
CVS Zinc Injection Containment Isolation Valve ORC	CVS-PL-V092	$\leq 60$ <sup>(1)</sup>		GEN-OTS-10-004
CVS Zinc Injection Containment Isolation Valve IRC	CVS-PL-V094	$\leq 60$ <sup>(1)</sup>		GEN-OTS-10-001
CVS Hydrogen Injection Containment Isolation Valve ORC	CVS-PL-V219	$\leq 60$ <sup>(1)</sup>		GEN-OTS-10-004
Containment Air Sample Containment Isolation Valve Inside Reactor Containment (IRC)	PSS-PL-V008	$\leq 60$ <sup>(1)</sup>		GEN-OTS-10-002
Liquid Sample Line Containment Isolation Valve IRC	PSS-PL-V010A	$\leq 60$ <sup>(1)</sup>		GEN-OTS-10-002
Liquid Sample Line Containment Isolation Valve IRC	PSS-PL-V010B	$\leq 60$ <sup>(1)</sup>		GEN-OTS-10-004

**Attachment A (con't)**

<b>Equipment Name<sup>(1)</sup></b>	<b>Tag No.<sup>(2)</sup></b>	<b>Required Valve Closure Time<sup>(3)</sup> (seconds)</b>	<b>Actual Valve Closure Time (seconds)</b>	<b>Test Procedure</b>
Liquid Sample Line Containment Isolation Valve Outside Reactor Containment (ORC)	PSS-PL-V011A	≤ 60 <sup>(1)</sup>		GEN-OTS-10-003
Liquid Sample Line Containment Isolation Valve ORC	PSS-PL-V011B	≤ 60 <sup>(1)</sup>		GEN-OTS-10-001
Sample Return Line Containment Isolation Valve ORC	PSS-PL-V023	≤ 60 <sup>(1)</sup>		GEN-OTS-10-001
Sample Return Containment Isolation Valve IRC	PSS-PL-V024	≤ 60 <sup>(1)</sup>		GEN-OTS-10-002
Air Sample Line Containment Isolation Valve ORC	PSS-PL-V046	≤ 60 <sup>(1)</sup>		GEN-OTS-10-001
Nitrogen Supply Containment Isolation Valve	PXS-PL-V042	≤ 60 <sup>(1)</sup>		GEN-OTS-10-004
RCS Outer Hot Leg Suction Motor-operated Isolation Valve	RNS-PL-V002A	≤ 60 <sup>(1)</sup>		RNS-OTS-17-004
RCS Outer Hot Leg Suction Motor-operated Isolation Valve	RNS-PL-V002B	≤ 60 <sup>(1)</sup>		RNS-OTS-17-004
RNS Discharge Motor-operated Containment Isolation Valve	RNS-PL-V011	≤ 60 <sup>(1)</sup>		GEN-OTS-10-001
RNS Suction Header Motor-operated Containment Isolation Valve	RNS-PL-V022	≤ 60 <sup>(1)</sup>		GEN-OTS-10-001
RNS Suction from IRWST Motor-operated Isolation Valve	RNS-PL-V023	≤ 60 <sup>(1)</sup>		GEN-OTS-10-002
RNS Return from Chemical and Volume Control System (CVS) Containment Isolation Valve	RNS-PL-V061	≤ 60 <sup>(1)</sup>		GEN-OTS-10-002
SFS Suction Line Containment Isolation MOV – IRC	SFS-PL-V034	≤ 60 <sup>(1)</sup>		GEN-OTS-10-002
SFS Suction Line Containment Isolation MOV – ORC	SFS-PL-V035	≤ 60 <sup>(1)</sup>		GEN-OTS-10-001

**Attachment A (con't)**

<b>Equipment Name<sup>(1)</sup></b>	<b>Tag No.<sup>(2)</sup></b>	<b>Required Valve Closure Time<sup>(3)</sup> (seconds)</b>	<b>Actual Valve Closure Time (seconds)</b>	<b>Test Procedure</b>
SFS Discharge Line Containment Isolation MOV – ORC	SFS-PL-V038	$\leq 60$ <sup>(1)</sup>		GEN-OTS-10-001
Power-operated Relief Valve Block Motor-operated Valve Steam Generator 01	SGS-PL-V027A	$\leq 60$ <sup>(1)</sup> ( $< 44$ ) <sup>(2)</sup>		GEN-OTS-10-002
Power-operated Relief Valve Block Motor-operated Valve Steam Generator 02	SGS-PL-V027B	$\leq 60$ <sup>(1)</sup> ( $< 44$ ) <sup>(2)</sup>		GEN-OTS-10-004
Steam Line Condensate Drain Isolation Valve	SGS-PL-V036A	$\leq 60$ <sup>(1)</sup>		GEN-OTS-10-004
Steam Line Condensate Drain Isolation Valve	SGS-PL-V036B	$\leq 60$ <sup>(1)</sup>		GEN-OTS-10-004
Main Steam Line Isolation Valve	SGS-PL-V040A	$< 5$ <sup>(1)</sup>		SGS-OTS-10-003
Main Steam Line Isolation Valve	SGS-PL-V040B	$< 5$ <sup>(1)</sup>		SGS-OTS-10-004
Main Feedwater Isolation Valve	SGS-PL-V057A	$< 5$ <sup>(1)</sup>		SGS-OTS-10-003
Main Feedwater Isolation Valve	SGS-PL-V057B	$< 5$ <sup>(1)</sup>		SGS-OTS-10-004
Startup Feedwater Isolation Motor-operated Valve	SGS-PL-V067A	$\leq 60$ <sup>(1)</sup>		GEN-OTS-10-002
Startup Feedwater Isolation Motor-operated Valve	SGS-PL-V067B	$\leq 60$ <sup>(1)</sup>		GEN-OTS-10-004
Steam Generator Blowdown Isolation Valve	SGS-PL-V074A	$\leq 60$ <sup>(1)</sup>		GEN-OTS-10-004
Steam Generator Blowdown Isolation Valve	SGS-PL-V074B	$\leq 60$ <sup>(1)</sup>		GEN-OTS-10-002
Main Steam Isolation Valve Bypass Isolation	SGS-PL-V240A	$\leq 60$ <sup>(1)</sup>		GEN-OTS-10-002/-004
Main Steam Isolation Valve Bypass Isolation	SGS-PL-V240B	$\leq 60$ <sup>(1)</sup>		GEN-OTS-10-002/-004
Containment Purge Inlet Containment Isolation Valve – ORC	VFS-PL-V003	$\leq 10$ <sup>(1)</sup>		GEN-OTS-10-001
Containment Purge Inlet Containment Isolation Valve – IRC	VFS-PL-V004	$\leq 10$ <sup>(1)</sup>		GEN-OTS-10-004

**Attachment A (con't)**

<b>Equipment Name<sup>(1)</sup></b>	<b>Tag No.<sup>(2)</sup></b>	<b>Required Valve Closure Time <sup>(3)</sup> (seconds)</b>	<b>Actual Valve Closure Time (seconds)</b>	<b>Test Procedure</b>
Containment Purge Discharge Containment Isolation Valve – IRC	VFS-PL-V009	≤ 10 <sup>(1)</sup>		GEN-OTS-10-004
Containment Purge Discharge Containment Isolation Valve – ORC	VFS-PL-V010	≤ 10 <sup>(1)</sup>		GEN-OTS-10-001
Vacuum Relief Containment Isolation A MOV – ORC	VFS-PL-V800A	≤ 30 <sup>(1)</sup>		GEN-OTS-10-001
Vacuum Relief Containment Isolation B MOV – ORC	VFS-PL-V800B	≤ 30 <sup>(1)</sup>		GEN-OTS-10-003
Fan Coolers Supply Containment Isolation Valve – ORC	VWS-PL-V058	≤ 60 <sup>(1)</sup>		VWS-OTS-10-001
Fan Coolers Return Containment Isolation Valve – IRC	VWS-PL-V082	≤ 60 <sup>(1)</sup>		VWS-OTS-10-001
Fan Coolers Return Containment Isolation Valve – ORC	VWS-PL-V086	≤ 60 <sup>(1)</sup>		VWS-OTS-10-001
Sump Discharge Containment Isolation Valve – IRC	WLS-PL-V055	≤ 60 <sup>(1)</sup>		GEN-OTS-10-001
Sump Discharge Containment Isolation Valve – ORC	WLS-PL-V057	≤ 60 <sup>(1)</sup>		GEN-OTS-10-004
Reactor Coolant Drain Tank (RCDT) Gas Outlet Containment Isolation Valve – IRC	WLS-PL-V067	≤ 60 <sup>(1)</sup>		GEN-OTS-10-001
RCDT Gas Outlet Containment Isolation Valve – ORC	WLS-PL-V068	≤ 60 <sup>(1)</sup>		GEN-OTS-10-004

<sup>(1)</sup> From U3/U4 COL Appendix C.

<sup>(2)</sup> From VEGP Unit 3 and 4 Updated Final Safety Analysis Report (UFSAR) Table 6.2.3-1.

<sup>(3)</sup> Required Valve Closure time will be the minimum value listed.