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52-026ND-19-0986
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 2.6.06.01.i [Index Number 637]

Ladies and Gentlemen:

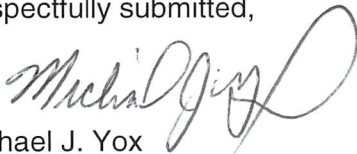
Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of Sept 20, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections Tests Analyses and Acceptance Criteria (ITAAC) Item 2.6.06.01.i [Index Number 637] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.6.06.01.i [Index Number 637]. 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 & 4Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.6.06.01.i [Index Number 637]

MJY/KM/sfr

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**Southern Nuclear Operating Company
ND-19-0986
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.6.06.01.i [Index Number 637]**

ITAAC Statement

Design Commitment

1. The EGS provides an electrical grounding system for: (1) instrument/computer grounding; (2) electrical system grounding of the neutral points of the main generator, main step-up transformers, auxiliary transformers, load center transformers, auxiliary and onsite standby diesel generators; and (3) equipment grounding of equipment enclosures, metal structures, metallic tanks, ground bus of switchgear assemblies, load centers, motor control centers, and control cabinets. Lightning protection is provided for exposed structures and buildings housing safety-related and fire protection equipment. Each grounding system and lightning protection system is grounded to the station grounding grid.

Inspections/Tests/Analyses

- i) An inspection for the instrument/computer grounding system connection to the station grounding grid will be performed.
- ii) An inspection for the electrical system grounding connection to the station grounding grid will be performed.
- iii) An inspection for the equipment grounding system connection to the station grounding grid will be performed.
- iv) An inspection for the lightning protection system connection to the station grounding grid will be performed.

Acceptance Criteria

- i) A connection exists between the instrument/computer grounding system and the station grounding grid.
- ii) A connection exists between the electrical system grounding and the station grounding grid.
- iii) A connection exists between the equipment grounding system and the station grounding grid.
- iv) A connection exists between the lightning protection system and the station grounding grid.

ITAAC Completion Description

The EGS provides an electrical grounding system for four grounding subsystems: (1) instrument/computer grounding; (2) electrical system grounding of the neutral points of the main generator, main step-up transformers, auxiliary transformers, load center transformers, and onsite standby diesel generators; (3) equipment grounding of equipment enclosures, metal structures, metallic tanks, ground bus of switchgear assemblies, load centers, motor control centers, and control cabinets and (4) Lightning protection is provided for exposed structures and buildings housing safety-related and fire protection equipment. Each grounding system and lightning protection system is grounded to the station grounding grid.

The connections to the station grounding grid for the four grounding subsections are identified in Table 1 of drawing SV3-0000-EG-003 and SV4-0000-EG-003 (References 1 and 2). Each connection is uniquely identified in the plan drawings. The connections to the station grounding grid are exothermic and installed in accordance with the project specification. Each connection is inspected and documented in accordance with 26139-000-4MP-T81C-N3307 (Reference 3).

The results of the inspection performed at each connection to the station grounding grid for the four grounding subsections are identified in SV3-EGS-ITR-800637 and SV4-EGS-ITR-800637 (References 4 and 5) and confirm; (1) a connection exists between the instrument/computer grounding system and the station grounding grid; (2) a connection exists between the electrical system grounding and the station grounding grid; (3) a connection exists between the equipment grounding system and the station grounding grid, and (4) a connection exists between the lightning protection system and the station grounding grid.

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. SV3-0000-EG-003-Rev X, "Grounding Plan Nuclear Island Building"
2. SV4-0000-EG-003-Rev X, "Grounding Plan Nuclear Island Building"
3. 26139-000-4MP-T81C-N3307, Rev X, "Grounding Installation Inspection Record"
4. SV3-EGS-ITR-800637-Rev X, "EGS Inspection Technical Report"
5. SV4-EGS-ITR-800637-Rev X, "EGS Inspection Technical Report"
6. 2.6.06.01.i-U3-CP-Rev 0, ITAAC Completion Package
7. 2.6.06.01.i-U4-CP-Rev 0, ITAAC Completion Package
8. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"