

SEP 26 2019

Docket Nos.: 52-025
52-026ND-19-1160
10 CFR 52.99(c)(3)U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001

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 2.3.04.10 [Index Number 337]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of September 26, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspection, Test, Analyses, and Acceptance Criteria (ITAAC) Item 2.3.04.10 [Index Number 337] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.3.04.10 [Index Number 337]. 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 2.3.04.10 [Index Number 337]

MJY/TMM/sfr

U.S. Nuclear Regulatory Commission
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Southern Nuclear Operating Company
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Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 and 4
Completion Plan for Uncompleted ITAAC 2.3.04.10 [Index Number 337]

ITAAC Statement

Design Commitment

10. Individual fire detectors provide fire detection capability and can be used to initiate fire alarms in areas containing safety-related equipment.

Inspections/Tests/Analyses

Testing will be performed on the as-built individual fire detectors in the fire areas identified in subsection 3.3, Table 3.3-3. (Individual fire detectors will be tested using simulated fire conditions.)

Acceptance Criteria

The tested individual fire detectors respond to simulated fire conditions.

ITAAC Completion Description

Testing is performed to demonstrate individual fire detectors provide fire detection capability and can be used to initiate fire alarms in areas containing safety-related equipment. The testing uses simulated fire conditions on the as-built individual fire detectors in the fire areas identified in VEGP COL, Appendix C, subsection 3.3, Table 3.3-3. Test results verify and document that individual fire detectors respond to simulated fire conditions.

Testing is performed in accordance with Unit 3 and Unit 4 component test package work orders (References 1 and 2). The testing verifies that the as-built individual fire detectors in the fire areas identified in Combined License (COL), Appendix C, subsection 3.3, Table 3.3-3 (Attachment A) respond to simulated fire conditions.

Testing is performed on each individual fire detector in each of the Fire Areas as identified in Attachment A. The Fire Protection System is verified to be installed such that alarm signals will be received by the Main Fire Protection Panel during simulated fire conditions. Testing simulates fire conditions for each fire detector of each fire detector type (smoke, heat, and linear) in each fire area. Testing verifies that fire alarms are received from each fire detector of each type by the Main Fire Protection Panel.

The completed Unit 3 and Unit 4 test results (References 1 and 2) confirm that individual fire detectors respond to simulated fire conditions.

References 1 and 2 are available for NRC inspection as part of the ITAAC Completion Packages (References 3 and 4).

List of ITAAC Findings

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company 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. SCN921209, SV3-ITAAC-ST-2.3.04.10, "FPS Individual Fire Detectors – ITAAC: SV3-2.3.04.10"
2. SCNYYYYYYY, SV4-ITAAC-ST-2.3.04.10, "FPS Individual Fire Detectors – ITAAC: SV4-2.3.04.10"
3. 2.3.04.10-U3-CP-Rev0, ITAAC Completion Package
4. 2.3.04.10-U4-CP-Rev0, ITAAC Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A

*** Excerpt from COL Appendix C Table 3.3-3**

Fire Area Number*
1200 AF 01
1220 AF 02
1200 AF 03
1201 AF 02
1201 AF 03
1201 AF 04
1201 AF 05
1201 AF 06
1202 AF 03
1202 AF 04
1220 AF 01
1230 AF 01
1230 AF 02
1240 AF 01
1242 AF 02
1250 AF 01