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52-026ND-19-1153  
10 CFR 52.99(c)(3)U.S. Nuclear Regulatory Commission  
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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 2.3.19.02a [Index Number 486]

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 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.3.19.02a [Index Number 486] 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 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.3.19.02a [Index Number 486]

MJY/CWM/sfr

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**Southern Nuclear Operating Company  
ND-19-1153  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.3.19.02a [Index Number 486]**

## **ITAAC Statement**

### **Design Commitment**

- 1.a) The EFS has handsets, amplifiers, loudspeakers, and siren tone generators connected as a telephone/page system.
- 1.b) The EFS has sound-powered equipment connected as a system.
- 2.a) The EFS telephone/page system provides intraplant, station-to-station communications and area broadcasting between the MCR and the locations listed in Table 2.3.19-1.
- 2.b) EFS provides sound-powered communications between the MCR, the RSW, the Division A, B, C, D dc equipment rooms (Rooms 12201/12203/12205/ 12207), the Division A, B, C, D I&C rooms (Rooms 12301/12302/12304/12305), and the diesel generator building (Rooms 60310/60320) without external power.

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

Inspection of the as-built system will be performed.

Inspection of the as-built system will be performed.

An inspection and test will be performed on the telephone/page communication equipment.

An inspection and test will be performed of the sound-powered communication equipment.

### **Acceptance Criteria**

The as-built EFS has handsets, amplifiers, loudspeakers, and siren tone generators connected as a telephone/page system.

The as-built EFS has sound-powered equipment connected as a system.

Telephone/page equipment is installed and voice transmission and reception from the MCR are accomplished.

Sound-powered equipment is installed and voice transmission and reception are accomplished.

### **ITAAC Completion Description**

This ITAAC is performed to verify, by inspection and testing, that the Communication System (EFS) is installed with handsets, amplifiers, loudspeakers, siren tone generators, and sound-powered equipment that is operating properly.

ITAAC 2.3.19.02a is completed as a combination of:

- Field inspections of the Plant Paging System (PPS)

- Field inspections of the Sound Powered Phones (SPP)
- Testing of the PPS with voice transmission and reception from the Main Control Room (MCR) and other required locations throughout the plant
- Testing of the SPP with transmission and reception between the MCR, Remote Shutdown Workstation (RSW) and other required locations throughout the plant

The inspections place operators in the field at predetermined locations where PPS and SPP components are installed and verify that the necessary equipment is available. The MCR personnel initiate a communication test and each operator in the field verifies the transmission from the MCR is received. The response back from the operator in the field to the MCR verifies the reception by the MCR is received. The PPS equipment that must be verified is listed in Combined Operating License (COL) Appendix C Table 2.3.19-1 (see Attachment A). The SSP equipment that must be verified is listed in COL Appendix C ITAAC No. 2.3.19.02a Item 2.b) (see Attachment B).

Additional tests verify the operators in the field can hear a plant page, fire alarm, and warble alarm from the PPS with a response to the MCR and other locations verifying the PPS is operating properly for these functions.

All the inspections and testing are performed using 3/4-EFS-ITPP-501 (References 1 and 2).

The completed Unit 3 and Unit 4 inspection and testing (References 1 and 2) confirm the as-built EFS has handsets, amplifiers, loudspeakers, and siren tone generators connected as a telephone/page system, the as-built EFS has sound-powered equipment connected as a system, telephone/page equipment is installed and voice transmission and reception from the MCR are accomplished, and sound-powered equipment is installed and voice transmission and reception are accomplished.

References 1 through 2 are available for NRC inspection as part of the ITAAC 2.3.19.02a Unit 3 and 4 Completion Packages (References 3 and 4).

### **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. 3-EFS-ITPP-501, "Communication System (EFS) Preoperational Test"
2. 4-EFS-ITPP-501, "Communication System (EFS) Preoperational Test"
3. ITAAC 2.3.19.02a-U3-CP-Rev0, "ITAAC Completion Package"
4. ITAAC 2.3.19.02a-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 Table 2.3.19-1\***

<b>Telephone/Page System Equipment*</b>	<b>Location*</b>
Fuel Handling Area	12562
Division A, B, C, D dc Equipment Rooms	12201/12203/12205/12207
Division A, B, C, D I&C Rooms	12301/12302/12304/12305
Maintenance Floor Staging Area	12351
Containment Maintenance Floor	11300
Containment Operating Deck	11500

**Attachment B**

<b>Sound-Powered Phone System Equipment</b>	<b>Location</b>
Main Control Room	12401
Remote Shutdown Workstation	12303
Division A, B, C, D dc Equipment Rooms	12201/12203/12205/12207
Division A, B, C, D I&C Rooms	12301/12302/12304/12305
Diesel Generator Building	60310/60320