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Docket Nos.: 52-026

ND-19-1186
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 4
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load
Item E.3.9.05.01.04 [Index Number 852]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of September 30, 2019, Vogtle Electric Generating Plant (VEGP) Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item E.3.9.05.01.04 [Index Number 852] 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 4
Completion Plan for Uncompleted ITAAC E.3.9.05.01.04 [Index Number 852]

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**Southern Nuclear Operating Company
ND-19-1186
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 4
Completion Plan for Uncompleted ITAAC E.3.9.05.01.04 [Index Number 852]**

ITAAC Statement

Program Commitment

5.1 The licensee has established a technical support center (TSC) and an onsite operations support center (OSC). [H.1]

Inspections/Tests/Analyses

5.1 An inspection of the as-built TSC and OSC will be performed, including a test of the capabilities.

Acceptance Criteria

5.1.4 The TSC is located within the protected area, and no major security barriers exist between the TSC and the control room.

ITAAC Completion Description

Multiple ITAAC are performed to confirm that the licensee has established a technical support center (TSC) and an onsite operations support center (OSC). This ITAAC performs an inspection of the TSC location to confirm that the as-built TSC is located within the protected area, and no major security barriers exist between the TSC and the Vogtle Electric Generating Plant (VEGP) Unit 4 control room. As described in NUREG-0696, Functional Criteria for Emergency Response Facilities (Reference 1), there should be no major security barriers between the TSC and the control room other than access control stations for the TSC and control room.

An inspection (walkdown) is completed using TSC and protected area approved construction drawings and visual observations to confirm that the as-built TSC is located within the protected area; and by performing visual observations of the travel path between the VEGP Unit 4 control room and the TSC to confirm there are no major security barriers between the TSC and the control room other than the access control stations to the TSC and control room.

The inspection results are documented in the Unit 4 Principal Closure Document XXX (Reference 2) supporting the Unit 4 ITAAC E.3.9.05.01.04 Completion Package (Reference 3) and verify that the TSC is located within the protected area, and no major security barriers exist between the TSC and the VEGP Unit 4 control room.

Reference 2 is available for NRC inspection as part of the Unit 4 ITAAC E.3.9.05.01.04 Completion Package (Reference 3).

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. NUREG-0696, Functional Criteria for Emergency Response Facilities
2. Principal Closure Document XXX
3. E.3.9.05.01.04-U4-CP-Rev0, ITAAC Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"