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Docket Nos.: 52-025  
52-026

ND-19-1218  
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 2.1.02.12a.ix [Index Number 61]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of October 7, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) Item 2.1.02.12a.ix [Index Number 61] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.1.02.12a.ix [Index Number 61]. 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 2.1.02.12a.ix [Index Number 61]

MJY/GJL/sfr

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**Southern Nuclear Operating Company  
ND-19-1218  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC Item 2.1.02.12a.ix [Index No. 61]**

## **ITAAC Statement**

### **Design Commitment**

12.a) The automatic depressurization valves identified in Table 2.1.2-1 perform an active safety-related function to change position as indicated in the table.

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

ix) See item 8.d.iv in this table.

### **Acceptance Criteria**

ix) See item 8.d.iv in this table.

## **ITAAC Completion Description**

This Inspection, Test, Analyses and Acceptance Criteria (ITAAC) Design Commitment is shown to be met by reference to ITAAC 2.1.02.08d.iv in VEGP Unit 3 Combined License (COL), Appendix C, Table 2.1.2-4. The reference Item 8d.iv of Table 2.1.2-4 will determine the effective flow area through each stage 1 Automatic Depressurization System (ADS) valve is  $\geq 4.6 \text{ in}^2$  and each stage 2 and 3 ADS valve is  $\geq 19 \text{ in}^2$ .

The ITAAC Closure Notifications (Reference 1 and 2) summarize the methodology for conducting the Inspections, Tests, Analyses (ITA), and the results that demonstrate that the acceptance criteria are met. This closure notification is submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination bases are referenced in the closure notification for Item 8.d.iv of VEGP Unit 3 & 4 COL Table 2.1.2-4 and are available for NRC inspection as part of the ITAAC Completion Packages (Reference 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 ITAAC findings pertaining to the subject ITAAC and associated corrective actions. This review found that there are no relevant ITAAC findings associated with these ITAAC. The ITAAC completion review is documented in the ITAAC Completion Packages for ITAAC 2.1.02.12a.ix Unit 3 and Unit 4 (Reference 3 and 4) and are available for NRC review.

**References (available for NRC inspection)**

1. Vogtle Unit 3 Letter ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.1.02.8d.iv [Index No. 35]
2. Vogtle Unit 4 Letter ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.1.02.8d.iv [Index No. 35]
3. 2.1.02.12a.ix-U3-CP-Rev0, ITAAC Completion Package
4. 2.1.02.12a.ix-U4-CP-Rev0, ITAAC Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"