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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  
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load  
Item 3.3.00.02a.ii.f [Index Number 769]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of October 14, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 3.3.00.02a.ii.f [Index Number 769] 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  
Completion Plan for Uncompleted ITAAC 3.3.00.02a.ii.f [Index Number 769]

MJY/PGL/amw

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**Southern Nuclear Operating Company  
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Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion Plan for Uncompleted ITAAC 3.3.00.02a.ii.f [Index Number 769]**

## **ITAAC Statement**

### **Design Commitment**

2.a) The nuclear island structures, including the critical sections listed in Table 3.3-7, are seismic Category I and are designed and constructed to withstand design basis loads as specified in the Design Description, without loss of structural integrity and the safety-related functions.

### **Inspections, Tests, Analyses**

ii) An inspection of the as-built concrete thickness will be performed.

### **Acceptance Criteria**

ii.f) A report exists that concludes that the as-built concrete thicknesses of the turbine building sections conform to the building sections defined in Table 3.3-1.

## **ITAAC Completion Description**

Multiple ITAAC are performed to verify the nuclear island structures, including the critical sections listed in Combined License (COL) Appendix C, Table 3.3-7, are seismic Category I and are designed and constructed to withstand design basis loads as specified in the Design Description, without loss of structural integrity and the safety-related functions. The subject ITAAC requires an inspection be performed and documented in a report that concludes the as-built concrete thicknesses of the turbine building conform to the building sections defined in COL Appendix C, Table 3.3-1 (Attachment A).

The inspections are performed of the as-built sections (following concrete placement) in accordance with the requirements of measurement guideline APP-GW-IT-001 (Reference 1), which identifies the location and frequency of inspection points for determining wall thickness to ensure the resulting measurements are representative of the entire section being inspected. The measurements are based on the size and construction type of each section. Measurements are taken using survey equipment in accordance with site survey procedure (Reference 2).

The inspection results are documented in Reference 3 and summarized in Attachment A which meets the ITAAC acceptance criteria.

References 1 thru 3 are available for NRC inspection as part of the Unit 3 ITAAC 3.3.00.02a.ii.f Completion Package (Reference 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. APP-GW-IT-001, "Guidelines for Concrete Wall and Slab Thickness Measurements"
2. 26139-000-4MP-T81C-N3201, "Construction Survey"
3. Principal Closure Document (Unit 3)
4. 3.3.00.02a.ii.f-U3-CP-Rev0, ITAAC Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process under 10 CFR Part 52"

### Attachment A

Table 3.3-1, Definition of Wall Thicknesses for Nuclear Island Buildings, Turbine Building, and Annex Building\* <sup>(1)</sup>

Wall or Section Description*	Column Lines* <sup>(4)</sup>	Floor Elevation or Elevation Range* <sup>(4)(5)</sup>	Concrete Thickness* <sup>(2)(3)(6)</sup>	Inspection results	
				Minimum recorded thickness	Maximum recorded thickness
Turbine Building*					
Wall adjacent to Column Line I.2	From Col. Line 11.05 to 11.2	From 100'-0" to 169'-0"	3'-0"	X'-xx.x"	Y'-yy.y"
Wall along Column Line 11.2	From near I.2 to near Col. Line R	From 100'-0" to 169'-0"	2'-0"	X'-xx.x"	Y'-yy.y"
Wall adjacent to Column Line R	From Col. Line 11.2 to Col. Line 11.02	From 100'-0" to 169'-0"	3'-0"	X'-xx.x"	Y'-yy.y"
Wall along Column Line 11.02	From near Col. Line R to near Col. Line Q	From 100'-0" to 169'-0"	2'-0"	X'-xx.x"	Y'-yy.y"
Wall along Column Line 11.05	From Col. Line K.4 to near Col. Line I.2	From 100'-0" to 169'-0"	2'-0"	X'-xx.x"	Y'-yy.y"

Notes:

\* Excerpt from COL Appendix C, Table 3.3-1 (Only listed notes that apply)

1. The column lines and floor elevations are identified and included on Figures 3.3-1 through 3.3-13.
2. These wall (and floor) thicknesses have a construction tolerance of  $\pm 1$  inch, except as noted and for exterior walls below grade where the tolerance is +12 inches, -1 inch. These tolerances are not applicable to the nuclear island basemat.

3. Where a wall (or a floor) has openings, the concrete thickness does not apply at the opening.
4. The Wall or Section Description, Column Line information, and Floor Elevation or Elevation Ranges are provided as reference points to define the general location. The concrete thickness of an item intersecting other walls, roofs or floors at a designated location (e.g., column line) is not intended to be measured to the stated column line, but only to the point where the intersection occurs.
5. Where applicable, the upper wall portions extend to their associated roofs, which may vary in elevation, e.g., sloped roofs.
6. From one wall/floor section to another, the concrete thickness transitions from one thickness to another, consistent with the configurations in Figures 3.3-1 through 3.3-14.