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Docket Nos.: 52-026

ND-19-1111
10 CFR 52.99(c)(1)U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
ITAAC Closure Notification on Completion of ITAAC 2.2.03.09a.iii [Index Number 203]


Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 4 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.03.09a.iii [Index Number 203] for verifying that a flow path with a flow area not less than 6 ft² exists from the loop compartment to the reactor vessel cavity. The closure process for this ITAAC is based on 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.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Tom Petrak at 706-848-1575.

Respectfully submitted,


Michael J. Yox
Regulatory Affairs Director Vogtle 3 & 4Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 2.2.03.09a.iii [Index Number 203]

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**Southern Nuclear Operating Company
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Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 2.2.03.09a.iii [Index Number 203]**

ITAAC Statement

Design Commitment

- 9.a) The PXS provides a function to cool the outside of the reactor vessel during a severe accident.

Inspections/Tests/Analyses

- iii) Inspections will be conducted of the flow path(s) from the loop compartments to the reactor vessel cavity.

Acceptance Criteria

- iii) A flow path with a flow area not less than 6 ft² exists from the loop compartment to the reactor vessel cavity.

ITAAC Determination Basis

Multiple ITAAC are performed to verify the Passive Core Cooling System (PXS) provides a function to cool the outside of the Reactor Vessel during a severe accident. The subject ITAAC requires that inspections of the flow path from the loop compartments to the Reactor Vessel Cavity be conducted to verify that a flow path with a flow area not less than 6 ft² exists.

The flow path inspected for this ITAAC was from the Steam Generator loop compartments, through the Vertical Access Room, down into the Reactor Coolant Drain Tank (RCDT) Room, into the Reactor Vessel Cavity access tunnel and into the Reactor Vessel Cavity. A walkdown was performed in accordance with Nuclear Construction and Startup Procedure (NCSP) 02-24, Rev 03.00, "ITAAC Support Activities (AP1000)" (Reference 1). The actual flow area of the identified flow path was determined from measurements taken at each limiting opening between rooms in the flow path to determine the width and height of the openings. Multiplication of the width and height measurements at each measurement point enabled determination of the area of the flow path at that measurement point. Calculations were then performed to determine the flow area for the identified flow path from the loop compartments to the Reactor Vessel Cavity.

Based upon the inspection described above, the most limiting flow area is at the transition from the Containment Recirculation Cooling System (VCS) duct to the reactor cavity access tunnel. The VCS duct and reactor cavity access tunnel are in the flow path between the Reactor Coolant Drain Tank (RCDT) Room and the reactor vessel cavity.

The flow area inspection results are documented in the Principal Closure Document (Reference 2) supporting the ITAAC 2.2.03.09a.iii Completion Package (Reference 3). The calculated limiting flow area for the flow path from the loop compartments to the Reactor Vessel Cavity is the transition from the VCS duct to the reactor cavity access tunnel, which was calculated to be 6.3 ft². This confirms that a flow path with a flow area not less than 6 ft² exists from the loop compartments to the Reactor Vessel Cavity and meets the ITAAC acceptance criteria.

The Principal Closure Documents exist and are available for NRC inspection as part of the ITAAC 2.2.03.09a.iii Completion Package.

ITAAC Finding Review

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 this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.2.03.09a.iii (Reference 3) and available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.2.03.09a.iii was performed for VEGP Unit 4 and that the prescribed acceptance criteria are met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. NCSP 02-24, Rev 03.00, "ITAAC Support Activities (AP1000)"
2. SV4-PXS-ITR-800203 Rev 0, "Inspection of the PXS Loop Compartments to Reactor Vessel Cavity Flow Area"
3. 2.2.03.09a.iii-U4-CP-Rev 0, ITAAC Completion Package