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Docket Nos.: 52-025
52-026ND-19-0920
10 CFR 52.99(c)(3)U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3 and Unit 4
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load
Item 2.7.04.03 [Index Number 716]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of October 28, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.7.04.03 [Index Number 716] 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 & 4Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.7.04.03 [Index Number 716]

MJY/JBN/sfr

To:

Southern Nuclear Operating Company/ Georgia Power Company

Mr. Peter P. Sena III (w/o enclosures)

Mr. D. L. McKinney (w/o enclosures)

Mr. M. D. Meier (w/o enclosures)

Mr. D. H. Jones (w/o enclosures)

Mr. G. Chick

Mr. M. Page

Mr. M. J. Yox

Mr. A. S. Parton

Ms. K. A. Roberts

Mr. T. G. Petrak

Mr. C. T. Defnall

Mr. C. E. Morrow

Mr. J. L. Hughes

Mr. S. Leighty

Ms. A. C. Chamberlain

Mr. J. C. Haswell

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cc:

Nuclear Regulatory Commission

Mr. W. Jones (w/o enclosures)

Mr. F. D. Brown

Mr. C. P. Patel

Mr. G. J. Khouri

Ms. S. E. Temple

Mr. N. D. Karlovich

Mr. A. Lerch

Mr. C. J. Even

Mr. B. J. Kemker

Ms. N. C. Coover

Mr. C. Welch

Mr. J. Gaslevic

Mr. V. Hall

Mr. G. Armstrong

Ms. T. Lamb

Mr. M. Webb

Mr. T. Fredette

Mr. C. Weber

Mr. S. Smith

Oglethorpe Power Corporation

Mr. R. B. Brinkman

Mr. E. Rasmussen

Municipal Electric Authority of Georgia

Mr. J. E. Fuller
Mr. S. M. Jackson

Dalton Utilities

Mr. T. Bundros

Westinghouse Electric Company, LLC

Dr. L. Oriani (w/o enclosures)
Mr. D. C. Durham (w/o enclosures)
Mr. M. M. Corletti
Ms. L. G. Iller
Mr. Z. S. Harper
Mr. J. L. Coward

Other

Mr. J. E. Hesler, *Bechtel Power Corporation*
Ms. L. Matis, *Tetra Tech NUS, Inc.*
Dr. W. R. Jacobs, Jr., Ph.D., *GDS Associates, Inc.*
Mr. S. Roetger, *Georgia Public Service Commission*
Ms. S. W. Kernizan, *Georgia Public Service Commission*
Mr. K. C. Greene, *Troutman Sanders*
Mr. S. Blanton, *Balch Bingham*

**Southern Nuclear Operating Company
ND-19-0920
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.7.04.03 [Index Number 716]**

ITAAC Statement

Design Commitment

3. Controls exist in the MCR to cause the components identified in Table 2.7.4-1 to perform the listed function.
4. Displays of the parameters identified in Table 2.7.4-1 can be retrieved in the MCR.

Inspections, Tests, Analyses

Testing will be performed on the components in Table 2.7.4-1 using controls in the MCR.

Inspection will be performed for retrievability of the parameters in the MCR.

Acceptance Criteria

Controls in the MCR operate to cause the components listed in Table 2.7.4-1 to perform the listed functions.

The displays identified in Table 2.7.4-1 can be retrieved in the MCR.

ITAAC Completion Description

Tests and inspections are performed to ensure controls exist in the Main Control Room (MCR) to cause the components identified in Combined License (COL) Table 2.7.4-1 (Attachment A) to perform the listed functions and to verify the displays of the parameters listed in Attachment A can be retrieved in the MCR.

Controls in the MCR operate to cause the components listed in Table 2.7.4-1 to perform the listed functions.

Testing is performed in accordance with Unit 3 and Unit 4 preoperational test procedures (References 1 and 2, respectively) to verify controls in the MCR operate to cause the Diesel Generator Building Ventilation System (VZS) components (fans and heaters) listed in COL Appendix C Table 2.7.4-1 (Attachment A) to perform the listed functions. At an MCR operator workstation, the fans listed in Attachment A are started using Plant Control System (PLS) controls from the MCR. For the heaters listed in Attachment A, the applicable heater controller is locally adjusted to above ambient temperature and the heaters are enabled using PLS controls from the MCR. Inspection verifies the fans start and heaters energize on the PLS monitor in the MCR and is documented in the test. Local verification of fan and heater status is performed during prerequisite component testing.

Unit 3 and Unit 4 preoperational test results (References 1 and 2, respectively) confirm that controls in the MCR operate to cause the components listed in Table 2.7.4-1 to perform the listed functions.

The displays identified in Table 2.7.4-1 can be retrieved in the MCR.

An inspection is performed in accordance with the Unit 3 and Unit 4 preoperational test procedures (References 1 and 2, respectively) for VZS component indication verifications, and visually confirms that when each of the displays of parameters identified in Attachment A is summoned at an MCR workstation, the summoned plant parameter appears on a display monitor at that MCR workstation.

The Unit 3 and Unit 4 preoperational test results (References 1 and 2, respectively) confirm that the VEGP Unit 3 and Unit 4 plant parameter displays identified in Attachment A can be retrieved in the MCR.

References 1 and 2 are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.7.04.03 Completion Packages (References 3 and 4, respectively).

List of ITAAC Findings

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company performed a review of all ITAAC findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant findings associated with the ITAAC.

References (available for NRC inspection)

1. 3-VZS-ITPP-501, "Diesel Generator Building Heating and Ventilation System Preoperational Test Procedure"
2. 4-VZS-ITPP-501, "Diesel Generator Building Heating and Ventilation System Preoperational Test Procedure"
3. 2.7.04.03-U3-CP-Rev 0, ITAAC Completion Package
4. 2.7.04.03-U4-CP-Rev 0, ITAAC Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A

*Excerpt of COL Appendix C Table 2.7.4-1

Table 2.7.4-1			
Equipment Name*	Tag No.*	Display*	Control Function*
Diesel Generator Room A Standby Exhaust Fans	VZS-MY-V01A VZS-MY-V02A	Yes (Run Status)	Start
Diesel Generator Room B Standby Exhaust Fans	VZS-MY-V01B VZS-MY-V02B	Yes (Run Status)	Start
Service Module A Air Handling Units (AHU) Supply Fan	VZS-MA-01A	Yes (Run Status)	Start
Service Module B AHU Supply Fan	VZS-MA-01B	Yes (Run Status)	Start
Diesel Oil Transfer Module Enclosure A Exhaust Fan	VZS-MY-V03A	Yes (Run Status)	Start
Diesel Oil Transfer Module Enclosure A Electric Unit Heater	VZS-MY-U03A	Yes (Run Status)	Energize
Diesel Oil Transfer Module Enclosure B Exhaust Fan	VZS-MY-V03B	Yes (Run Status)	Start
Diesel Oil Transfer Module Enclosure B Electric Unit Heater	VZS-MY-U03B	Yes (Run Status)	Energize