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52-026ND-19-1330  
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 2.3.29.02 [Index Number 489]

Ladies and Gentlemen:

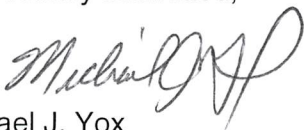
Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of October 25, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.3.29.02 [Index Number 489] has not been completed 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 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.3.29.02 [Index Number 489]

MJY/DLW/sfr

U.S. Nuclear Regulatory Commission

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**Southern Nuclear Operating Company  
ND-19-1330  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.3.29.02 [Index Number 489]**

## **ITAAC Statement**

### **Design Commitment**

2. The WRS collects liquid wastes from the equipment and floor drainage of the radioactive portions of the auxiliary building, annex building, and radwaste building and directs these wastes to a WRS sump or WLS waste holdup tanks located in the auxiliary building.

3. The WRS collects chemical wastes from the auxiliary building chemical laboratory drains and the decontamination solution drains in the annex building and directs these wastes to the chemical waste tank of the liquid radwaste system.

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

A test is performed by pouring water into the equipment and floor drains in the radioactive portions of the auxiliary building, annex building, and radwaste building.

A test is performed by pouring water into the auxiliary building chemical laboratory and the decontamination solution drains in the annex building.

### **Acceptance Criteria**

The water poured into these drains is collected either in the auxiliary building radioactive drains sump or the WLS waste holdup tanks.

The water poured into these drains is collected in the chemical waste tank of the liquid radwaste system.

## **ITAAC Completion Description**

Testing is performed in accordance with Unit 3 and Unit 4 preoperational tests (References 1 and 2) to confirm the Radioactive Waste Drain System (WRS) collects liquid wastes from the equipment and floor drainage of the radioactive portions of the auxiliary building, annex building, and radwaste building and directs these wastes to a WRS sump or Liquid Radwaste System (WLS) waste holdup tanks located in the auxiliary building. Additionally, testing is performed to confirm WRS collects chemical wastes from the auxiliary building chemical laboratory drains and the decontamination solution drains in the annex building and directs these wastes to the chemical waste tank of the liquid radwaste system.

The drains affected by this ITAAC are listed in attachments in the preoperational test procedures (References 1 and 2) and have been verified by current piping and instrument drawings.

The water poured into these drains is collected either in the auxiliary building radioactive drains sump or the WLS waste holdup tanks.

Testing is performed by pumping down the WRS sump and installing drain plugs or covers, as appropriate, for all the affected drain paths. Water is poured into the equipment and floor drains of the radioactive portions of the auxiliary building, annex building, and radwaste building. Each

drain is tested individually while monitoring the sump level and verifying sump level increase or verifying flow from the correct pipe into the sump when water is poured into a drain path. Additional testing is performed on the WLS waste holdup tanks room drains and auxiliary building elevator pit drain which have normally isolated drain paths. Water is poured into the floor drain and then isolation valves are opened to align the drain to the sump pump suction line to pump the water to one of the WLS waste holdup tanks. Each drain is tested individually while monitoring the tank level and verifying the waste holdup tank level increase.

The Unit 3 and Unit 4 preoperational test results (References 1 and 2) confirm that the water poured into these drains is collected either in the auxiliary building radioactive drains sump or the WLS waste holdup tanks

The water poured into these drains is collected in the chemical waste tank of the liquid radwaste system.

Testing is performed by initially ensuring an adequate volume is available in the chemical waste tank to accept the water from the testing and installing drain plugs or covers, as appropriate, for all the affected drains. The cover for the drain to be tested is removed and water is poured into each of the drains in the auxiliary building chemical laboratory and the decontamination solution drains in the annex building, one drain at a time, while monitoring the chemical waste tank level of the WLS and verifying the tank level increases for each drain tested.

The Unit 3 and Unit 4 preoperational test results (References 1 and 2) confirm that the water poured into these drains is collected in the chemical waste tank of the liquid radwaste system.

References 1 and 2 are available for NRC inspection as part of ITAAC 2.3.29.02 Unit 3 and 4 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 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. 3-WRS-ITPP-501, "Radioactive Waste Drain System Preoperational Test Procedure"
2. 4-WRS-ITPP-501, "Radioactive Waste Drain System Preoperational Test Procedure"
3. 2.3.29.02-U3-CP-Rev0, ITAAC Completion Package
4. 2.3.29.02-U4-CP-Rev0, ITAAC Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"