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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 2.7.06.03.i [Index Number 726]

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 2.7.06.03.i [Index Number 726] 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 2.7.06.03.i [Index Number 726]

MJY/DLW/sfr

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**Southern Nuclear Operating Company
ND-19-1324
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.7.06.03.i [Index Number 726]**

ITAAC Statement

Design Commitment

3. The VFS provides the intermittent flow of outdoor air to purge the containment atmosphere during normal plant operation, and continuous flow during hot or cold plant shutdown conditions.
4. Controls exist in the MCR to cause the components identified in Table 2.7.6-1 to perform the listed function.
5. Displays of the parameters identified in Table 2.7.6-1 can be retrieved in the MCR.

Inspections/Tests/Analyses

- i) Testing will be performed to confirm that containment supply AHU fan A when operated with containment exhaust fan A provides a flow of outdoor air.
- ii) Testing will be performed to confirm that containment supply AHU fan B when operated with containment exhaust fan B provides a flow of outdoor air.
- iii) Inspection will be conducted of the containment purge discharge line (VFS-L204) penetrating the containment.

Testing will be performed on the components in Table 2.7.6-1 using controls in the MCR.

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

Acceptance Criteria

- i) The flow rate measured at each fan is greater than or equal to 3,600 scfm.
- ii) The flow rate measured at each fan is greater than or equal to 3,600 scfm.
- iii) The nominal line size is ≥ 36 in.

Controls in the MCR operate to cause the components listed in Table 2.7.6-1 to perform the listed functions.

The displays identified in Table 2.7.6-1 can be retrieved in the MCR.

ITAAC Completion Description

Testing and inspections are performed in accordance with Unit 3 and Unit 4 preoperational tests (References 1 and 2), Unit 3 and 4 ITAAC Technical Report (References 3 and 4), and Unit 3 and Unit 4 component test packages (References 5 and 6) to confirm the Containment Air Filtration System (VFS) provides the intermittent flow of outdoor air to purge the containment atmosphere during normal plant operation, and continuous flow during hot or cold plant

shutdown conditions, that controls exist in the Main Control Room (MCR) to cause the components identified in Combined License (COL) Appendix C Table 2.7.6-1 to perform the listed function, and displays of the parameters identified in COL Appendix C Table 2.7.6-1 can be retrieved in the MCR.

i) The flow rate measured at each fan is greater than or equal to 3,600 scfm

Testing is performed in accordance with Unit 3 and Unit 4 preoperational test procedures (References 1 and 2). The test is conducted by running containment supply fan A (VFS-MA-01A) and containment exhaust fan A (VFS-MA-02A) and measuring airflow for each fan. The measured airflow readings are corrected for instrument accuracy and for standard conditions. The corrected airflow is compared to the acceptance criteria and verified to exceed the minimum flow.

The Unit 3 A containment supply fan produced a minimum flow of XXXX scfm and the Unit 3 A containment exhaust fan produced a minimum flow of YYYY scfm during testing. The Unit 4 A containment supply fan produced a minimum flow of XXXX scfm and the Unit 4 A containment exhaust fan produced a minimum flow of YYYY scfm during testing.

The Unit 3 and Unit 4 preoperational test results (References 1 and 2) confirm that each VFS A containment supply fan and containment exhaust fan produces a flow rate measured at each fan that is greater than or equal to 3,600 scfm.

ii) The flow rate measured at each fan is greater than or equal to 3,600 scfm.

Testing is performed in accordance with Unit 3 and Unit 4 preoperational test procedures (References 1 and 2). The test is conducted by running containment supply fan B (VFS-MA-01B) and containment exhaust fan B (VFS-MA-02B) and measuring airflow for each fan. The measured airflow readings are corrected for instrument accuracy and for standard conditions. The corrected airflow is compared to the acceptance criteria and verified to exceed the minimum flow.

The Unit 3 B containment supply fan produced a minimum flow of XXXX scfm and the Unit 3 B containment exhaust fan produced a minimum flow of YYYY scfm during testing. The Unit 4 B containment supply fan produced a minimum flow of XXXX scfm and the Unit 4 B containment exhaust fan produced a minimum flow of YYYY scfm during testing.

The Unit 3 and Unit 4 preoperational test results (References 1 and 2) confirm that each VFS B containment supply fan and containment exhaust fan produces a flow rate measured at each fan that is greater than or equal to 3,600 scfm.

iii) The nominal line size is \geq 36 in.

An inspection is conducted of the containment purge discharge line (VFS-L204) penetrating the containment to verify the containment penetration nominal size is \geq 36 in. The inspection is performed by walking down and visually verifying the containment penetration location and inspecting the Quality Assurance Data Package (QADP). ITAAC Technical Report (ITR) (References 3 and 4) documents the inspection and the QADP review and document the line size is 36 in.

The Unit 3 and Unit 4 ITRs (References 3 and 4) confirm the nominal line size is ≥ 36 in.

Controls in the MCR operate to cause the components listed in Table 2.7.6-1 to perform the listed functions.

Testing is performed in accordance with Unit 3 and Unit 4 component test procedures (References 5 and 6) to verify that controls in the MCR operate to cause the components listed in Table 2.7.6-1 (Attachment A) to perform the listed functions.

Testing is conducted at an operator work station in Unit 3 and Unit 4 MCR and the VFS train A and B are verified to be in a standby alignment. The containment air handling unit supply fan A is placed in service in accordance with the operating procedure and verified to start and then removed from service in accordance with the operating procedure. This is repeated for the three remaining fans.

This testing confirms that controls in the Unit 3 and Unit 4 MCR operate to cause the components listed in Table 2.7.6-1 to perform the listed functions.

The displays identified in Table 2.7.6-1 can be retrieved in the MCR.

The inspection is performed in accordance with Unit 3 and Unit 4 component test procedures (References 5 and 6) to verify that the displays identified in Table 2.7.6-1 (Attachment B) can be retrieved in the MCR.

The component test is conducted in the MCR at the PLS displays and verifies the displays in Attachment B can be retrieved in the MCR. Each display in Attachment C is located on the PLS displays and verified to indicate properly.

This confirms that all the displays identified in Table 2.7.6-1 can be retrieved in Unit 3 and Unit 4 MCR.

References 1 through 6 are available for NRC inspection as part of ITAAC 2.7.06.03.i Unit 3 and 4 Completion Packages (Reference 7 and 8).

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-VFS-ITPP-501, "Containment Air Filtration System Preoperational Test Procedure"
2. 4-VFS-ITPP-501, "Containment Air Filtration System Preoperational Test Procedure"
3. SV3-VFS-ITR-800726, "Dimensions of the Containment Purge Discharge Line"
4. SV4-VFS-ITR-800726, "Dimensions of the Containment Purge Discharge Line"

5. SNC922131, "Containment Air Filtration System Control and Indication Verifications – ITAAC: SV3-2.7.06.03.i Items 4 and 5"
6. SNCXXXXXX, "Containment Air Filtration System Control and Indication Verifications – ITAAC: SV4-2.7.06.03.i Items 4 and 5"
7. 2.7.06.03.i-U3-CP-Rev0, ITAAC Completion Package
8. 2.7.06.03.i-U4-CP-Rev0, ITAAC Completion Package
9. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A

*Excerpt from COL Appendix C Table 2.7.6-1

*Equipment	*Tag No.	*Control Function
Containment Air Handling Units (AHU) Supply Fan A	VFS-MA-01A	Start
Containment AHU Supply Fan B	VFS-MA-01B	Start
Containment Exhaust Fan A	VFS-MA-02A	Start
Containment Exhaust Fan B	VFS-MA-02B	Start

Attachment B

*Excerpt from COL Appendix C Table 2.7.6-1

*Equipment	*Tag No.	*Display
Containment Air Handling Units (AHU) Supply Fan A	VFS-MA-01A	Yes (Run Status)
Containment AHU Supply Fan B	VFS-MA-01B	Yes (Run Status)
Containment AHU Supply Fan A Flow Sensor	VFS-012A	Yes
Containment AHU Supply Fan B Flow Sensor	VFS-012B	Yes
Containment Exhaust Fan A	VFS-MA-02A	Yes (Run Status)
Containment Exhaust Fan B	VFS-MA-02B	Yes (Run Status)
Containment Exhaust Fan A Flow Sensor	VFS-011A	Yes
Containment Exhaust Fan B Flow Sensor	VFS-011B	Yes