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Docket Nos.: 52-025

ND-19-1556  
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 3  
Notification of Partial Completion of ITAAC 2.2.03.08c.x [Index Number 195]

Ladies and Gentlemen:

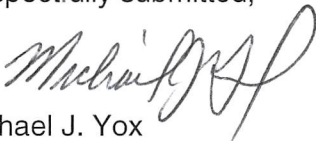
In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the partial completion of Vogtle Electric Generating Plant (VEGP) Unit 3 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.03.08c.x [Index Number 195] for confirming the PXS provides RCS makeup, boration, and safety injection during design basis events. The closure process for this ITAAC is based on the guidance described in Nuclear Energy Institute (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 partial ITAAC closure notification addresses an analysis showing that coatings applied on-site with a dry film density less than the ITAAC acceptance criteria will not transport in the post-accident containment flow. The remaining portions of the ITAAC regarding other coatings, tags and signs, ventilation filters, and fire barriers are not addressed. No other partial submittals have been submitted on this ITAAC.

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 3  
Partial Completion of ITAAC 2.2.03.08c.x [Index Number 195]

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**Southern Nuclear Operating Company  
ND-19-1556  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3  
Partial Completion of ITAAC 2.2.03.08c.x [Index Number 195]**

### **ITAAC Statement**

#### **Design Commitment:**

8.c) The PXS provides RCS makeup, boration, and safety injection during design basis events.

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

x) Inspections will be conducted of the as-built nonsafety-related coatings or of plant records of the nonsafety-related coatings used inside containment on walls, floors, ceilings, and structural steel except in the CVS room. Inspections will be conducted of the as-built nonsafety-related coatings or of plant records of the nonsafety-related coatings used on components below the maximum flood level of a design basis LOCA or located above the maximum flood level and not inside cabinets or enclosures.

Inspections will be conducted on caulking, tags, and signs used inside containment below the maximum flood level of a design basis LOCA or located above the maximum flood level and not inside cabinets or enclosures.

Inspections will be conducted of ventilation filters and fiber-producing fire barriers used inside containment within the ZOI or below the maximum flood level of a design basis LOCA.

#### **Acceptance Criteria:**

x) A report exists and concludes that the coatings used on these surfaces have a dry film density of  $\geq 100 \text{ lb/ft}^3$ . If a coating is used that has a lower dry film density, a report must exist and conclude that the coating will not transport. A report exists and concludes that inorganic zinc coatings used on these surfaces are Safety – Service Level I or have been quantified and justified in a program for management of unqualified coatings to demonstrate the unqualified coatings are acceptable for use.

A report exists and concludes that tags and signs used in these locations are made of steel or another metal with a density  $\geq 100 \text{ lb/ft}^3$ . In addition, a report exists and concludes that caulking used in these locations or coatings used on these signs or tags have a dry film density of  $\geq 100 \text{ lb/ft}^3$ . If a material is used that has a lower density, a report must exist and conclude that there is insufficient water flow to transport lightweight caulking, signs, or tags.

A report exists and concludes that the ventilation filters and fire barriers in these locations have a density of  $\geq 100 \text{ lb/ft}^3$ .

### **ITAAC Completion Description**

Multiple ITAAC are performed to demonstrate that the Passive Core Cooling System (PXS) provides Reactor Coolant System (RCS) makeup, boration, and safety injection during design basis events.

This partial ITAAC Completion Notification (ICN) addresses only the portion of the acceptance criteria for coatings applied on-site regarding “If a coating is used that has a lower dry film density, a report must exist and conclude that the coating will not transport.” The remaining portions of the ITAAC regarding other coatings, tags and signs, ventilation filters, and fire

barriers will be addressed in the final ICN. No other partial submittals have been submitted on this ITAAC.

One batch of coating applied in containment was identified as having a dry film density (DFD) value slightly less than the ITAAC acceptance criteria. Engineering & Design Coordination Report (E&DCR) APP-AX01-GEF-019 (Reference 1) was performed to evaluate and address this batch of coating. This document performed an analysis to demonstrate that coatings with DFD values slightly less than the acceptance criteria are not transported to an AP1000 screen or into the core through a flooded break. The Unqualified Coating Log was updated to account for the lower density coating batch. See the details in Reference 1.

This evaluation provides evidence that the partial ICN portion of the ITAAC Acceptance Criteria requirements are met:

- If a coating is used that has a lower dry film density, a report must exist and conclude that the coating will not transport

Reference 1 is available for NRC inspection.

**References (available for NRC inspection)**

1. Engineering & Design Coordination Report (E&DCR) APP-AX01-GEF-019 Rev. 0, "Dry Film Density Conversion Factor Correction"
2. NEI 08-01, "Industry Guideline for the ITAAC Closure Process under 10 CFR Part 52"