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ND-20-0099
10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission
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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 2.2.01.11a.iii [Index Number 116]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of Jan. 30, 2020, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspection, Test, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.01.11a.iii [Index Number 116] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.2.01.11a.iii [Index Number 116]. 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.

Southern Nuclear Operating Company (SNC) previously submitted Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load for Item 2.2.01.11a.iii [Index Number 116] ND-17-1134 [ML17186A036], dated June 30, 2017. This resubmittal supersedes ND-17-1134 in its entirety.

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

U.S. Nuclear Regulatory Commission
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Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.2.01.11a.iii [Index Number 116]

MJY/DLW/sfr

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**Southern Nuclear Operating Company
ND-20-0099
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and 4
Completion Plan for Uncompleted ITAAC 2.2.01.11a.iii [Index Number 116]**

ITAAC Statement

Design Commitment

11.a) The motor-operated and check valves identified in Table 2.2.1-1 perform an active safety-related function to change position as indicated in the table.

Inspections/Tests/Analyses

iii) Tests of the motor-operated valves will be performed under preoperational flow, differential pressure, and temperature conditions.

Acceptance Criteria

iii) Each motor-operated valve changes position as indicated in Table 2.2.1-1 under pre-operational test conditions.

ITAAC Completion Description

Multiple ITAAC are performed to verify that the motor-operated and check valves identified in Combined License (COL) Appendix C Table 2.2.1-1 (Attachment A) perform an active safety-related function to change position as indicated in Attachment A. The subject ITAAC verifies testing of the motor-operated valves (MOVs) under preoperational flow, differential pressure, and temperature conditions.

Testing is performed in accordance with Unit 3 and Unit 4 preoperational test procedures 3-SFS-ITPP-502 and 4-SFS-ITPP-502 (References 1 and 2), 3-CCS-ITPP-501 and 4-CCS-ITPP-501 (References 3 and 4), and 3-VFS-ITPP-501 and 4-VFS-ITPP-501 (References 5 and 6) to verify that the motor-operated valves identified in Attachment A perform an active safety-related function to change position as indicated in Attachment A. Testing is performed on the MOVs under pre-operational flow, differential pressure, and temperature conditions and each MOV is verified to change positions as indicated in Attachment A.

References 1 and 2 confirm that each of the Spent Fuel Pool Cooling System (SFS) MOVs listed in Attachment A can be closed under preoperational flow, differential pressure, and temperature conditions. The SFS is aligned to take a suction from the refueling cavity and discharge back to the refueling cavity. The SFS valves listed in Attachment A are verified to be open, an SFS pump is placed in service recirculating the refueling cavity, SFS-PL-V034 is placed in local control, and a spent fuel pool low level signal is generated to close the SFS valves in Attachment A. SFS-PL-V035 and SFS-PL-V038 are verified to close locally and in the Main Control Room (MCR) and the SFS pump is verified to trip on low flow. SFS-PL-V034 is returned to remote control and SFS-PL-V035 is placed in local control. The SFS valves in Attachment A are verified open, an SFS pump is placed in service recirculating the refueling cavity and the spent fuel pool low level signal is generated again causing the SFS valves to close. SFS-PL-V034 is verified to close locally and in the MCR. The results of the Unit 3 and Unit 4 tests are documented in References 1 and 2.

References 3 and 4 confirm that each of the Unit 3 and Unit 4 Component Cooling Water System (CCS) MOVs listed in Attachment A can be closed under preoperational flow,

differential pressure, and temperature conditions. The CCS system is aligned with normal flow to and from containment with the A CCS pump in service. The CCS MOVs in Attachment A are closed one at a time, verified to be closed by MCR indication and locally and then reopened to reestablish system flow. The results of the Unit 3 and Unit 4 tests are documented in References 3 and 4.

References 5 and 6 confirm that each of the Containment Air Filtration System (VFS) MOVs listed in Attachment A can be closed and opened under preoperational flow, differential pressure, and temperature conditions. The VFS is in a normal system alignment and each of the MOVs listed in Attachment A are operated to the open position, verified locally and in the MCR and then operated to the closed position and verified locally and in the MCR. The results of the Unit 3 and Unit 4 tests are documented in References 5 and 6.

References 1 through 6 confirm that each motor-operated valve changes position as indicated in Attachment A under pre-operational test conditions. References 1 through 6 are available for NRC inspection as part of the ITAAC 2.2.01.11a.iii Completion Package (Reference 7).

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-SFS-ITPP-502, "Spent Fuel Pool Cooling System Flow Path Preoperational Test Procedure"
2. 4-SFS-ITPP-502, "Spent Fuel Pool Cooling System Flow Path Preoperational Test Procedure"
3. 3-CCS-ITPP-501, "Component Cooling Water System Preoperational Test Procedure"
4. 4-CCS-ITPP-501, "Component Cooling Water System Preoperational Test Procedure"
5. 3-VFS-ITPP-501, "Containment Air Filtration System Preoperational Test Procedure"
6. 4-VFS-ITPP-501, "Containment Air Filtration System Preoperational Test Procedure"
7. ITAAC 2.2.01.11a.iii Completion Package
8. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A

Excerpt from COL Appendix C Table 2.2.1-1

Equipment Name	Tag No.	Active Function
Component Cooling Water System (CCS) Containment Isolation Motor-operated Valve (MOV) – Inlet Line Outside Reactor Containment (ORC)	CCS-PL-V200	Transfer Closed
CCS Containment Isolation MOV – Outlet Line IRC	CCS-PL-V207	Transfer Closed
CCS Containment Isolation MOV – Outlet Line ORC	CCS-PL-V208	Transfer Closed
SFS Discharge Line Containment Isolation MOV - ORC	SFS-PL-V038	Transfer Closed
SFS Suction Line Containment Isolation MOV - IRC	SFS-PL-V034	Transfer Closed
SFS Suction Line Containment Isolation MOV - ORC	SFS-PL-V035	Transfer Closed
Vacuum Relief Containment Isolation A MOV - ORC	VFS-PL-V800A	Transfer Closed/ Transfer Open
Vacuum Relief Containment Isolation B MOV - ORC	VFS-PL-V800B	Transfer Closed/ Transfer Open