

April 27, 2020

Docket Nos.: 52-026

ND-20-0485
10 CFR 52.99(c)(1)

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
ITAAC Closure Notification on Completion of ITAAC 2.2.03.08c.iv.04 [Index Number 186]

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 completion of Vogtle Electric Generating Plant (VEGP) Unit 4 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.03.08c.iv.04 [Index Number 186]. This ITAAC verifies that the maximum elevation of the top inside surface of the Passive Residual Heat Removal Heat Exchanger (PRHR HX) outlet line to Steam Generator (SG) connection is less than the elevation of the PRHR HX lower channel head top inside surface. The closure process for this ITAAC is based on 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.

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 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4
 Completion of ITAAC 2.2.03.08c.iv.04 [Index Number 186]

MJY/WLP/sfr

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Southern Nuclear Operating Company
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Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 2.2.03.08c.iv.04 [Index No. 186]

ITAAC Statement

Design Commitment:

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

Inspections, Tests, Analysis:

iv) Inspections of the elevation of the following pipe lines will be conducted:

4. PRHR HX outlet line to SG connection

Acceptance Criteria:

iv) The maximum elevation of the top inside surface of these lines is less than the elevation of:

4. PRHR HX lower channel head top inside surface

ITAAC Determination Basis

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 ITAAC requires that inspections be conducted to verify that the maximum elevation of the top inside surface of the Passive Residual Heat Removal Heat Exchanger (PRHR HX) outlet line to Steam Generator (SG) connection is less than the elevation of the PRHR HX lower channel head top inside surface.

The inspections of the PRHR HX outlet line to SG connection top-of-pipe surface was performed using survey equipment in accordance with the site survey and measurement procedure (Reference 1). The conservative wall thickness, derived from installed pipe data, was subtracted from the top-of-pipe survey data to obtain the highest elevation of the inside surface of these lines (Reference 2). The elevation of the PRHR HX lower channel head top outside surface was determined using survey equipment in accordance with the site survey and measurement procedure (Reference 1). As-built manufacturer's data was used to derive the PRHR HX lower channel head wall thickness. The PRHR HX lower channel head top inside surface elevation was then determined by subtracting the as-built manufacturer's lower channel head wall thickness from the top outside surface of the lower channel head (Reference 2). The maximum derived elevation of the top inside surface of the PRHR HX outlet line to SG connection was compared to the derived elevation of the top inside surface of the PRHR HX lower channel head.

The inspection results documented in Reference 2 verify that the maximum elevation of the PRHR HX outlet line to SG connection top inside surface is 110.5 feet and the elevation of the PRHR HX lower channel head top inside surface is 112.0 feet, which meets the ITAAC acceptance criteria. The Reference 2 inspection results are available for NRC inspection as part of the ITAAC Completion Package (Reference 3).

ITAAC Finding Review

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.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.2.03.08c.iv.04 was performed for VEGP Unit 4 and that the prescribed acceptance criteria are met. Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. 26139-000-4MP-T81C-N3201, Rev 5, "Construction Survey"
2. SV4-PXS-FSK-800186, Rev 1, "Unit 4 As-Built PRHR HX Outlet Lines Elevation Comparison to PRHR HX Lower Channel Head Top Inside Surface Elevation"
3. 2.2.03.08c.iv.04-U4-CP-Rev0, "Completion Package for the Unit 4 ITAAC 2.2.03.08c.iv.04 [Index Number 186]"