

April 27, 2020

Docket Nos.: 52-026

ND-20-0433  
10 CFR 52.99(c)(1)

U.S. Nuclear Regulatory Commission  
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Southern Nuclear Operating Company  
Vogtle Electric Generating Plant Unit 4  
ITAAC Closure Notification on Completion of ITAAC Item 3.3.00.06a [Index Number 787]

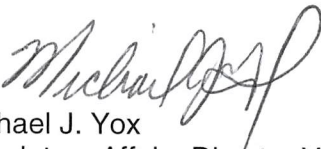
Ladies and Gentlemen:

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 Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) Item 3.3.00.06a [Index Number 787]. This ITAAC concludes that the as-built available room volumes of the radiologically controlled area of the auxiliary building between floor elevations 66'-6" and 82'-6" exceed the volume of the liquid radwaste storage tanks (WLS-MT-05A, MT-05B, MT-06A, MT-06B, MT-07A, MT-07B, MT-07C, MT-11). 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) request 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 3.3.00.06a [Index Number 787]  
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**Southern Nuclear Operating Company  
ND-20-0433  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 4  
Completion of ITAAC Item 3.3.00.06a [Index No. 787]**

## **ITAAC Statement**

### **Design Commitment**

6.a) The available room volumes of the radiologically controlled area of the auxiliary building between floor elevations 66'-6" and 82'-6" exceed the volume of the liquid radwaste storage tanks (WLS-MT-05A, MT-05B, MT-06A, MT-06B, MT-07A, MT-07B, MT-07C, MT-11).

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

An inspection will be performed of the as-built radiologically controlled area of the auxiliary building between floor elevations 66'-6" and 82'-6" to define volume.

### **Acceptance Criteria**

A report exists and concludes that the as-built available room volumes of the radiologically controlled area of the auxiliary building between floor elevations 66'-6" and 82'-6" exceed the volume of the liquid radwaste storage tanks (WLS-MT-05A, MT-05B, MT-06A, MT-06B, MT-07A, MT-07B, MT-07C, MT-11).

## **ITAAC Determination Basis**

This ITAAC requires that an inspection be performed of the as-built radiologically controlled area (RCA) of the auxiliary building between floor elevations 66'-6" and 82'-6" to ensure available room volume exceeds the volume of the liquid radwaste storage tanks (WLS-MT-05A, MT-05B, MT-06A, MT-06B, MT-07A, MT-07B, MT-07C, MT-11).

The as-built tank diameters are documented in the as-built information contained in the Quality Assurance Data Package (QADP) provided for the eight liquid radwaste storage tanks. In addition, field measurements were obtained to supplement the Tank's QADP data to obtain the tank parameters necessary to support the tank volume calculations in Reference 2.

Inspections of the RCA portion of the auxiliary building rooms between elevations 66'-6" and 82'-6" were performed to the extent necessary to demonstrate and document that available room volume is more than the as-built tank volumes. Available room volume for this purpose is defined as the total room volume minus the volume of components or commodities within the room. Only those RCA auxiliary building rooms needed to provide the available room volume needed to meet the ITAAC acceptance criteria were inspected. Examples of such rooms are defined personnel and/or equipment access corridors, and reserved equipment removal spaces. Measurements taken to calculate available room volume were taken in accordance with the ITAAC Support Activities procedure (Reference 1), as applicable.

The as-built tank volumes of the liquid radwaste storage tanks are 21,398 ft<sup>3</sup> and the available room volume of the RCA in the auxiliary building is 27,228 ft<sup>3</sup>. The inspection plan, results of the visual inspections, available room volume calculation, and as-built tank volumes are documented in Principal Closure Documents (Reference 2) that demonstrate that the as-built available room volumes for the RCA portion of the auxiliary building between floor elevations 66'-6" and 82'-6" exceed the as-built volume of the liquid radwaste storage tanks.

The inspection results and calculations conclude that the as-built available room volumes of the RCA of the auxiliary building between floor elevations 66'-6" and 82'-6" exceed the volume of the liquid radwaste storage tanks (WLS-MT-05A, MT-05B, MT-06A, MT-06B, MT-07A, MT-07B, MT-07C, MT-11).

### **ITAAC Finding Review**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all ITAAC findings pertaining to the subject ITAAC and associated corrective actions. This review found that there are no relevant ITAAC findings associated with these ITAAC. The ITAAC completion review is documented in the ITAAC Completion Packages for ITAAC 3.3.00.06a, Unit 4 (Reference 3) and are available for NRC review.

### **ITAAC Completion Statement**

Based on the above information, SNC hereby notifies the NRC that ITAAC 3.3.00.06a was performed for VEGP Unit 4 and that the prescribed acceptance criteria were 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. NCSP 02-24, Rev. 3, "ITAAC Support Activities (AP1000)"
2. SV4-WLS-ITR-800787, Rev. 0, "Unit 4: ITAAC 787 Auxiliary Building Radiation Area As-Built Available Room Volume (3.3.00.06a)"
3. 3.3 00.06a-U4-CP-Rev0, ITAAC Completion Package