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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3 and Unit 4
ITAAC Closure Notification on Completion of ITAAC C.3.8.02.01 [Index Number 843]

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 3 and Unit 4 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item C.3.8.02.01 [Index Number 843]. This ITAAC verifies that the American Society of Mechanical Engineers (ASME) Code Design Reports (NCA-3550) (certified, when required by the ASME Code) exist and conclude that the design of the piping for lines chosen to demonstrate all aspects of piping design complies with the requirements for ASME Code section. 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 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,

A handwritten signature in dark ink, appearing to read "Michael J. Yox", written in a cursive style.

Michael J. Yox
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion of ITAAC C.3.8.02.01 [Index Number 843]

MJY/JRV/sfr

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**Southern Nuclear Operating Company
ND-20-0810
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion of ITAAC C.3.8.02.01 [Index Number 843]**

ITAAC Statement

Design Commitment

The American Society of Mechanical Engineers (ASME) Code, Section III piping is designed in accordance with the ASME Code, Section III requirements.

Inspections/Tests/Analyses

Inspection of the ASME Code Design Reports (NCA-3550) and required documents will be conducted for the set of lines chosen to demonstrate compliance.

Acceptance Criteria

The ASME Code Design Report(s) (NCA-3550) (certified, when required by the ASME Code) exist and conclude that the design of the piping for lines chosen to demonstrate all aspects of the piping design complies with the requirements of the ASME Code section.

ITAAC Determination Basis

An inspection of American Society of Mechanical Engineers (ASME) Code Design Reports (NCA-3550) and supporting documents was conducted for the set of lines chosen to demonstrate compliance with the ASME Code, Section III piping design requirements. Classifications of AP1000 piping systems are defined in Section 3.2 of the VEGP Updated Final Safety Analysis Report (UFSAR) (Reference 1). The as-designed piping design acceptance criteria (DAC) are documented in certified ASME Code Design Reports (P0Rs) and supporting documents. Piping lines chosen to demonstrate all aspects of the piping design including ASME Section III piping analysis, support evaluations and piping component fatigue analysis for Class 1 piping are defined in UFSAR Subsection 3.9.8.7 (Reference 1) and are designed in accordance with the ASME Boiler and Pressure Vessel (B&PV) Code, Section III (ASME Code) requirements 1998 Edition, 2000 Addenda, with additional restrictions for piping design as described in VEGP UFSAR Subsection 5.2.1 (Reference 1). The piping lines chosen to demonstrate compliance with the ASME Code are listed in Attachment A. Stress Reports identified as Piping Packages (Pipe Line Reports-PLRs) in Attachment A are listed in the ITAAC Unit 3 and Unit 4, C.3.8.02.01 Completion Package (Reference 2) and represent the required input (document) to the ASME Code Design Reports (P0Rs).

Certified ASME Code Design Reports were issued and maintained as a quality record and document the inspection for each of the As-Designed Stress Reports. The scope of review includes the following areas:

- The piping system Design Specification in accordance with ASME Code Section III, Subsection NCA-3252, including loading definitions and load combinations.
- Thermal Analysis, in accordance with ASME Code Section III, applicable Subsection NB, NC or ND and Appendix C-1200.
- Structural Analysis, in accordance with ASME Code Section III, applicable Subsection NB, NC or ND and Appendix C-1300.
- Fatigue Analysis for the Class 1 piping in accordance with ASME Code Section III, applicable Subsection NB and Appendix C-1400.

Inspections of the certified ASME Code Design Reports listed in Attachment A and other required documents such as design specifications and the associated supporting calculations verify that the design of each chosen set of piping complies with the requirements of ASME Code, Section III. The certified ASME Code Design Reports are documented in ITAAC Unit 3 and Unit 4, C.3.8.02.01 Completion Package (Reference 2) and are available for NRC inspection.

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. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC C.3.8.02.01 for Unit 3 and Unit 4 (Reference 2) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC C.3.8.02.01 was performed for VEGP Unit 3 and 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. VEGP 3&4 Updated Final Safety Analysis Report
 - a. Subsection 3.2 Classification of Structures, Components, and Systems
 - b. Subsection 3.9.8.7 As Designed Piping Analysis
 - c. Subsection 5.2.1 Compliance with Codes and Code Cases,
 - d. Table 3.9-20 Piping Packages Chosen to Demonstrate Piping Design for Piping DAC Closure
2. C.3.8.02.01-U0-CP-Rev0, ITAAC Completion Package
3. NEI 08-01, Rev. 5 Corrected, "Industry Guideline for ITAAC Closure Process Under 10 CFR Part 52"

Attachment A (Sheet 1 of 2)
Piping Packages and Design Reports Chosen to
Demonstrate Piping Design for Piping DAC Closure

ASME Class*	Line Description*	Piping Package Number*	Certified Design Report(s)
2*	Hot Leg 2 I&C*	APP-RCS-PLR-210*	APP-RCS-P0R-210
1,3*	Reactor Head Vent*	APP-RCS-PLR-230*	APP-RCS-P0R-230
2*	Hot Leg 1 I&C*	APP-RCS-PLR-260*	APP-RCS-P0R-260
2*	Hot Leg 1 Sampling*	APP-RCS-PLR-460*	APP-RCS-P0R-460
2*	Hot Leg 2 Sampling*	APP-RCS-PLR-470*	APP-RCS-P0R-470
2*	Pressurizer Sampling*	APP-RCS-PLR-480*	APP-RCS-P0R-480
2*	Pressurizer I&C*	APP-RCS-PLR-510*	APP-RCS-P0R-510
2/3*	Component Cooling from Penetration C01 IRC*	APP-CCS-PLR-040*	APP-CCS-P0R-040
2/3*	Component Cooling from Penetration C02 IRC*	APP-CCS-PLR-050*	APP-CCS-P0R-050
2/3*	CVS Makeup from Penetration C03 IRC*	APP-CVS-PLR-090*	APP-CVS-P0R-090
2/3*	CVS Letdown from Penetration 002 IRC 2*	APP-CVS-PLR-100*	APP-CVS-P0R-100
2/3*	ACC-A/B3 Makeup*	APP-PXS-PLR-620*	APP-PXS-P0R-620
2/3*	SFS from Penetration C01*	APP-SFS-PLR-600*	APP-SFS-P0R-600
2/3*	Feedwater to SG 01*	APP-SGS-PLR-010*	APP-SGS-P0R-010
2/3*	Feedwater to SG 02*	APP-SGS-PLR-020*	APP-SGS-P0R-020
2/3*	Main Steam to SG 01*	APP-SGS-PLR-030*	APP-SGS-P0R-030
2/3*	Main Steam to SG 02*	APP-SGS-PLR-040*	APP-SGS-P0R-040
2/3*	SG01 Blowdown to Penetration C03A*	APP-SGS-PLR-070*	APP-SGS-P0R-070
2/3*	SG02 Blowdown to Penetration C03B*	APP-SGS-PLR-080*	APP-SGS-P0R-080
2/3*	SG01 Startup Feed Water from Penetration C05A*	APP-SGS-PLR-310*	APP-SGS-P0R-310
2/3*	SG02 Startup Feed Water from Penetration C05B*	APP-SGS-PLR-320*	APP-SGS-P0R-320
2/3*	VWS Supply from Containment Penetration C02*	APP-VWS-PLR-500*	APP-VWS-P0R-500
2/3*	VWS Return to Containment Penetration C01*	APP-VWS-PLR-530*	APP-VWS-P0R-530
2/3*	Component Cooling from Penetration C01 ORC*	APP-CCS-PLR-810*	APP-CCS-P0R-810
2/3*	Component Cooling from Penetration C02 ORC*	APP-CCS-PLR-820*	APP-CCS-P0R-820

Attachment A (Sheet 2 of 2)
Piping Packages and Design Reports Chosen to
Demonstrate Piping Design for Piping DAC Closure

ASME Class*	Line Description*	Piping Package Number *	Certified Design Report(s)
2/3*	CVS Makeup from Penetration C03 ORC*	APP-CVS-PLR-530*	APP-CVS-P0R-530
2/3*	PCS Recirculation, DWS Supply, and FPS Supply*	APP-PCS-PLR-100*	APP-PCS-P0R-100
2/3*	From Spent Fuel to RNS and PCCWST Drain*	APP-RNS-PLR-100*	APP-RNS-P0R-100
2/3*	Normal RHR to Heat Exchangers and Pumps from Containment Penetrations C01 and C02*	APP-RNS-PLR-170*	APP-RNS-P0R-170
2/3*	Spent Fuel Cooling Module R3-65*	APP-SFS-PLR-350*	APP-SFS-P0R-350
2/3*	SG01 Startup Feedwater to Penetration C05A*	APP-SGS-PLR-110*	APP-SGS-P0R-110
2/3*	SG02 Startup Feedwater to Penetration C05B*	APP-SGS-PLR-120*	APP-SGS-P0R-120
2/3*	Nonradioactive Vent Return from Main Control Room*	APP-VBS-PLR-010*	APP-VBS-P0R-010
2/3*	Nonradioactive Vent Supply to Main Control Room*	APP-VBS-PLR-030*	APP-VBS-P0R-030
2/3*	VWS Supply to Containment Penetration C02*	APP-VWS-PLR-910*	APP-VWS-P0R-910
2/3*	VWS Return from Containment Penetration C01*	APP-VWS-PLR-920*	APP-VWS-P0R-920
1	Direct Vessel Injection A	APP-PXS-PLR-010	APP-PXS-P0R-010
1	Direct Vessel Injection B	APP-PXS-PLR-020	APP-PXS-P0R-020
1	Supply to CMT 02A	APP-PXS-PLR-050	APP-PXS-P0R-050
1	Supply to CMT 02B	APP-PXS-PLR-060	APP-PXS-P0R-060
1	Normal Residual Heat Removal Suction Loop 2	APP-RNS-PLR-010	APP-RNS-P0R-010
1	ADS Stage 4 Loop1 and PRHR HX Inlet Isolation	APP-PXS-PLR-030	APP-PXS-P0R-030
1	PRHR HX Return Loop 1	APP-PXS-PLR-040	APP-PXS-P0R-040
1	ADS 1,2 & 3 and Pressurizer Safety Valve Inlets	APP-RCS-PLR -010	APP-RCS-P0R-010
1	Press. Spray, Aux. Spray, CVS Letdown, CVS Charging	APP-RCS-PLR-020	APP-RCS-P0R-020
1	4TH Stage ADS East Loop 2	APP-RCS-PLR-030	APP-RCS-P0R-030
1	PZR Surge Line Loop 1	APP-RCS-PLR-040	APP-RCS-P0R-040
1	Primary Loop	APP-RCS-PLR-050	APP-RCS-P0R-050

* Excerpted from UFSAR Table 3.9-20 in addition to Class 1 lines larger than 1 inch in diameter