



MAR 09 2021

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Docket No.: 52-026

ND-21-0143
10 CFR 52.99(c)(3)

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

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load
Item 2.2.03.08c.iii [Index Number 182]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of March 8, 2021, Vogtle Electric Generating Plant (VEGP) Unit 4 Uncompleted Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) Item 2.2.03.08c.iii [Index Number 182] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.2.03.08c.iii [Index Number 182]. 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.

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 Kelli Roberts at 706-848-6991

Respectfully submitted,

Michael J. Yox
Regulatory Affairs Director Vogtle 3&4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4 Completion Plan for Uncompleted ITAAC Item 2.2.03.08c.iii [Index Number 182]

MJY/WLP/sfr

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**Southern Nuclear Operating Company
ND-21-0143
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 4
Completion Plan for Uncompleted ITAAC Item 2.2.03.08c.iii [Index Number 182]**

ITAAC Statement

Design Commitment

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

Inspections/Tests/Analyses

iii) Inspections of the routing of the following pipe lines will be conducted:

- CMT inlet line, cold leg to high point
- PRHR HX inlet line, hot leg to high point.

Acceptance Criteria

iii) These lines have no downward sloping sections between the connection to the RCS and the high point of the line.

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 ITAAC requires that inspections be conducted to verify that the routing of the Core Makeup Tank (CMT) inlet lines from the cold leg and the Passive Residual Heat Removal Heat Exchanger (PRHR HX) inlet line from the hot leg have no downward sloping sections between the connection to the RCS and the high point of the lines.

The inspection of the routing of each CMT and PRHR HX inlet lines is performed during a walk-down of the as-built lines in accordance with the site walk down inspection procedure (Reference 1). When required to confirm the downward slope or lack of a downward slope, the slope of the lines is determined using survey equipment in accordance with site procedures (Reference 2).

The inspection results are documented in the Unit 4 inspection report (Reference 3) and determine that each CMT and the PRHR HX inlet lines have no downward sloping sections between their connection to the RCS and their respective high point of the line which meets the ITAAC acceptance criteria.

References 1, 2 and 3 are available for NRC inspection as well as the Unit 4 completion package (Reference 4).

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. NCSP02-24, "ITAAC Support Activities"
2. 26139-000-4MP-T81C-N3201, "Construction Survey"
3. SV4-PXS-ITR-800182, "Unit 4 ITAAC 182 Walkdown 2.2.03.08c.iii NRC Index Number 182"
4. 2.2.03.08c.iii-U4-CP-Rev0, ITAAC Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"