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Docket No.: 52-026

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Vogtle 3 & 4

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ND-20-1108  
10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission  
Document Control Desk  
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Southern Nuclear Operating Company  
Vogtle Electric Generating Plant Unit 4  
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load  
Item 2.3.03.02 [Index Number 319]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of March 05, 2021, Vogtle Electric Generating Plant (VEGP) Unit 4 Uncompleted Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) Item 2.3.03.02 [Index Number 319] has not been completed greater than 225-days prior to initial fuel load. Enclosure 1 describes the plan for completing ITAAC 2.3.03.02 [Index Number 319]. 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 A. 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 2.3.03.02 [Index Number 319]

MJY/JFV/sfr

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**Southern Nuclear Operating Company  
ND-20-1108  
Enclosure 1**

**Vogtle Electric Generating Plant (VEGP) Unit 4  
Completion Plan for Uncompleted ITAAC Item 2.3.03.02 [Index No. 319]**

## **ITAAC Statement**

### **Design Commitment**

2. The ancillary diesel generator fuel tank can withstand a seismic event.

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

Inspection will be performed for the existence of a report verifying that the as-built ancillary diesel generator fuel tank and its anchorage are designed using seismic Category II methods and criteria.

### **Acceptance Criteria**

A report exists and concludes that the as-built ancillary diesel generator fuel tank and its anchorage are designed using seismic Category II methods and criteria.

## **ITAAC Completion Description**

An inspection will be conducted to verify that the ancillary diesel generator fuel tank can withstand a seismic event. The inspection will confirm the existence of a report verifying that the as-built ancillary diesel generator fuel tank and its anchorage are designed using the seismic Category II methods and criteria described in VEGP 3&4 Updated Final Safety Analysis Report, Section 3.7, Seismic Design (Reference 1). VEGP 3&4 Updated Final Safety Analysis Report, Table 3.2-3, AP1000 Classification of Mechanical and Fluid Systems, Components and Equipment (Reference 2) identifies the ancillary diesel generator fuel tank as Seismic Category II.

The ancillary diesel generator fuel tank supplier issues a seismic analysis report that is referenced in the Ancillary Diesel Fuel Tank and Anchorage Design As-Built Report XXX (Reference 3). The as-built design report is reviewed to verify that the ancillary diesel generator fuel tank and anchorage meets seismic Category II requirements using the seismic Category II methods and criteria described in Reference 1. Inspections are performed following ancillary diesel generator fuel tank installation to confirm that the as-built tank and its anchorage are installed per design report specifications. Inspection non-conformances are documented and dispositioned to ensure the as-built tank and its anchorage are designed and constructed to seismic Category II methods and criteria.

The Ancillary Diesel Fuel Tank and Anchorage Design As-Built Report XXX documents that the as-built ancillary diesel generator fuel tank and its anchorage are designed using seismic Category II methods and criteria. This report is available for NRC inspection as part of the ITAAC 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. VEGP 3&4 Updated Final Safety Analysis Report, Section 3.7, Seismic Design
2. VEGP 3&4 Updated Final Safety Analysis Report, Table 3.2-3, AP1000 Classification of Mechanical and Fluid Systems, Components and Equipment
3. Ancillary Diesel Fuel Tank and Anchorage Design As-Built Report XXX
4. 2.3.03.02-U4-CP-Rev 0, ITAAC Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"