



Michael J. Yox
Regulatory Affairs Director
Vogtle 3 & 4

7825 River Road
Waynesboro, GA 30830
706-848-6459 tel

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Docket No.: 52-026

ND-21-0155
10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission
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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 2.2.03.08c.iv.02 [Index Number 184]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of March 10, 2021, Vogtle Electric Generating Plant (VEGP) Unit 4 Uncompleted Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) Item 2.2.03.08c.iv.02 [Index Number 184] has not been completed greater than 225-days prior to initial fuel load. Enclosure 1 describes the plan for completing ITAAC 2.2.03.08c.iv.02 [Index Number 184]. 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 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.iv.02 [Index Number 184]

MJY/RMS/sfr

To:

Southern Nuclear Operating Company/ Georgia Power Company

Mr. Peter P. Sena III (w/o enclosures)
Mr. D. L. McKinney (w/o enclosures)
Mr. M. D. Meier (w/o enclosures)
Mr. G. Chick
Mr. S. Stimac
Mr. P. Martino
Mr. M. J. Yox
Mr. A. S. Parton
Ms. K. A. Roberts
Mr. C. T. Defnall
Mr. C. E. Morrow
Mr. R. L. Beilke
Mr. S. Leighty
Ms. A. C. Chamberlain
Mr. J. C. Haswell
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cc:

Nuclear Regulatory Commission

Ms. M. Bailey (w/o enclosures)
Mr. M. King
Ms. A. Veil
Mr. C. P. Patel
Mr. G. J. Khouri
Mr. C. J. Even
Mr. B. J. Kemker
Ms. N. C. Coover
Mr. C. Welch
Mr. J. Gaslevic
Mr. O. Lopez-Santiago
Mr. G. Armstrong
Mr. M. Webb
Mr. T. Fredette
Mr. C. Santos
Mr. B. Davis
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Mr. J. Eargle
Mr. E. Davidson
Mr. T. Fanelli
Mr. S. Rose
Ms. K. McCurry

Oglethorpe Power Corporation

Mr. R. B. Brinkman
Mr. E. Rasmussen

Municipal Electric Authority of Georgia

Mr. J. E. Fuller
Mr. S. M. Jackson

Dalton Utilities

Mr. T. Bundros

Westinghouse Electric Company, LLC

Dr. L. Oriani (w/o enclosures)
Mr. D. C. Durham (w/o enclosures)
Mr. M. M. Corletti
Mr. Z. S. Harper
Mr. J. L. Coward

Other

Mr. S. W. Kline, *Bechtel Power Corporation*
Ms. L. Matis, *Tetra Tech NUS, Inc.*
Dr. W. R. Jacobs, Jr., Ph.D., *GDS Associates, Inc.*
Mr. S. Roetger, *Georgia Public Service Commission*
Mr. R. L. Trokey, *Georgia Public Service Commission*
Mr. K. C. Greene, *Troutman Sanders*
Mr. S. Blanton, *Balch Bingham*

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**Southern Nuclear Operating Company
ND-21-0155
Enclosure 1**

**Vogtle Electric Generating Plant (VEGP) Unit 4
Completion Plan for Uncompleted ITAAC Item 2.2.03.08c.iv.02 [Index No. 184]**

ITAAC Statement

Design Commitment

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

Inspections/Tests/Analyses

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

2. Containment recirculation lines; containment to IRWST lines

Acceptance Criteria

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

2. IRWST bottom inside surface

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 maximum elevation of the top inside surface of the Containment recirculation lines and the Containment to the In-containment Refueling Water Storage Tank (IRWST) lines is less than the elevation of the IRWST bottom inside surface.

The inspection of the elevations of the top inside surface of the Containment recirculation lines, the Containment to IRWST lines, and the IRWST bottom inside surface is performed using survey equipment in accordance with site survey and measurement procedure (Reference 1). The conservative wall thickness, derived from installed pipe data, is subtracted from the top-of-pipe survey data to obtain the highest elevation of the inside surface of these lines. The maximum derived elevation of the top inside surface of the Containment recirculation lines and the Containment to IRWST lines is compared to the elevation of the bottom inside surface of the IRWST using a common reference point.

The inspection results documented in Reference 2, verify that the maximum elevation of the top inside surface of the containment recirculation lines is XXX.X feet; the maximum elevation of the top inside surface of the containment to IRWST lines is XXX.X feet, and the elevation of the IRWST bottom inside surface is XXX.X feet, which meets the ITAAC acceptance criteria.

References 1 and 2 are available for NRC inspection as part of Unit 4 ITAAC 2.2.03.08c.iv.02 Completion Package (Reference 3).

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. 26139-000-4MP-T81C-N3201, "Construction Survey"
2. SV4-PXS-FSK-800184 Rev X, "As-Built IRWST Injection/Recirculation Lines Top Inside Surface Elevation Comparison to IRWST Bottom Inside Surface"
3. ITAAC 2.2.03.08c.iv.02-U4-CP-Rev 0, ITAAC Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"