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10 CFR 52.99(c)(1)U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3
ITAAC Closure Notification on Completion of ITAAC 2.6.09.05a [Index Number 644]

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 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.6.09.05a [Index Number 644]. This ITAAC confirms that security alarm annunciation and video assessment information is displayed concurrently in the central alarm station (CAS) and the secondary alarm station (SAS), and provides video image recording with real time playback capability. This ITAAC also confirms that the intrusion detection system concurrently provides visual displays and audible annunciations of alarms in both the CAS and SAS. 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 Kelli Roberts at 706-848-6991.

Respectfully submitted,

Michael J. Yox
Regulatory Affairs Director Vogtle 3 & 4Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC 2.6.09.05a [Index Number 644]

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**Southern Nuclear Operating Company
ND-21-0270
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC 2.6.09.05a [Index Number 644]**

ITAAC Statement

Design Commitment

5.a) Security alarm annunciation and video assessment information is displayed concurrently in the central alarm station and the secondary alarm station, and the video image recording with real time playback capability can provide assessment of activities before and after each alarm annunciation within the perimeter area barrier.

15.b) Intrusion detection and assessment systems concurrently provide visual displays and audible annunciation of alarms in the central and secondary alarm stations.

Inspections/Tests/Analyses

Test, inspection, or a combination of test and inspections of the installed systems will be performed.

Tests will be performed on intrusion detection and assessment equipment.

Acceptance Criteria

Security alarm annunciation and video assessment information is displayed concurrently in the central alarm station and the secondary alarm station, and the video image recording with real time playback capability provides assessment of activities before and after alarm annunciation within the perimeter barrier.

The intrusion detection system concurrently provides visual displays and audible annunciations of alarms in both the central and secondary alarm stations.

ITAAC Determination Basis

Testing of the perimeter area barrier security alarm annunciation and video assessment systems was performed to verify that security alarm annunciation and video assessment information is displayed concurrently in the Central Alarm Station (CAS) and the Secondary Alarm Station (SAS), and the video image recording with real time playback capability provides assessment of activities before and after alarm annunciation within the perimeter barrier. Testing also verified that the intrusion detection system provides concurrent visual displays and audible annunciations of intrusion detection alarms in both the CAS and SAS. The Vogtle Electric Generating Plant (VEGP) Unit 3 Plant Security System ITAACs only cover the Unit 3 plant security system design commitment scope.

Security alarm annunciation and video assessment information is displayed concurrently in the central alarm station and the secondary alarm station, and the video image recording with real time playback capability provides assessment of activities before and after alarm annunciation within the perimeter barrier.

Tests were performed as identified in ITAAC Technical Report SV3-SES-ITR-800644 (Reference 1) to verify that VEGP Unit 3 intrusion detection system perimeter area barrier alarms resulted in concurrent displays of security alarm annunciation and video assessment information in both the CAS and SAS, video image recording with real time playback capability provides assessment of activities before and after alarm annunciation within the perimeter barrier, and satisfy the applicable alarm annunciation and video assessment requirements of the VEGP Units 3 and 4 Physical Security Plan associated with 10 CFR 73.55(i) and 10 CFR 73.55(e)(7)(i)(C).

The tests identified in Reference 1 tested each segment of the VEGP Unit 3 protected area perimeter intrusion detection system by crossing or disturbing the zone of detection and confirming that concurrent displays of the security alarm annunciation and video assessment information were observed in both the CAS and SAS. The tests identified in Reference 1 then confirmed that for each perimeter barrier intrusion detection system alarm the security video assessment system provided video image recording with real time display of video images to provide post-alarm activity assessment and playback of recorded video images for pre-alarm activity assessment to both CAS and SAS.

The test results documented in Reference 1 verify that the VEGP Unit 3 security alarm annunciation and video assessment information was displayed concurrently in the CAS and the SAS, and that video image recording with real time playback capability provided assessment of activities before and after alarm annunciation within the perimeter barrier.

The intrusion detection system concurrently provides visual displays and audible annunciations of alarms in both the central and secondary alarm stations.

Testing was performed as identified in Reference 1 to verify that VEGP Unit 3 intrusion detection system alarms provided concurrent visual displays and audible annunciations of the alarms in both the CAS and SAS, and satisfy the applicable intrusion detection alarm requirements of the VEGP Units 3 and 4 Physical Security Plan associated with 10 CFR 73.55(i).

The tests identified in Reference 1 tested the VEGP Unit 3 intrusion detection system by initiating a security alarm signal for each intrusion detection device identified in the Vogtle Plant Security System Database (Reference 2) and confirming that, for each alarm signal, a concurrent visual display and audible annunciation of the alarm was observed in both CAS and SAS.

The test results are documented in Reference 1 and verify that the VEGP Unit 3 intrusion detection system concurrently provided visual displays and audible annunciations of alarms in both the CAS and SAS.

References 1 and 2 are available for NRC inspection as part of the Unit 3 ITAAC 2.6.09.05a Completion Package (Reference 3).

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 were no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.6.09.05a (Reference 3) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.6.09.05a was performed for VEGP Unit 3 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. SV3-SES-ITR-800644, Intrusion Detection/Video Assessment Testing: ITAAC 2.6.09.05a, Rev 0 (SRI)
2. SV0-SES-J0X-800000, Vogtle Plant Security System Database, Revision 7 (SRI)
3. 2.6.09.05a-U3-CP-Rev0, ITAAC Completion Package