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Docket No.: 52-025

ND-21-0956
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 Item 2.1.03.07.i [Index Number 78]

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 2.1.03.07.i [Index Number 78] to verify that the reactor internals will withstand the effects of flow induced vibration and the reactor lower internals assembly is equipped with holders for at least eight capsules for storing material surveillance specimens. The closure process for this ITAAC is based on 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.

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 2.1.03.07.i [Index Number 78]

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**Southern Nuclear Operating Company
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Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC 2.1.03.07.i [Index Number 78]**

ITAAC Statement

Design Commitment

7. The reactor internals will withstand the effects of flow induced vibration.

10. The reactor lower internals assembly is equipped with holders for at least eight capsules for storing material surveillance specimens.

Inspections/Tests/Analyses

i) Not Used per Amendment No. 151.

ii) A pre-test inspection, a flow test and a post-test inspection will be conducted on the as-built reactor internals.

Inspection of the reactor lower internals assembly for the presence of capsules will be performed.

Acceptance Criteria

i) Not Used per Amendment No. 151.

ii) The as-built reactor internals have no observable damage or loose parts.

At least eight capsules are in the reactor lower internals assembly.

ITAAC Determination Basis

This ITAAC required that tests and inspections be performed and documented to ensure the reactor internals withstood the effects of flow induced vibration and that the reactor lower internals assembly is equipped with holders for at least eight capsules for storing material surveillance specimens.

7.ii) The as-built reactor internals have no observable damage or loose parts.

A pre-Hot Functional Test (HFT) inspection was performed to document the initial condition of the reactor internals, including all major load-bearing elements that retain the position of the core support structure; lateral, vertical, and torsional restraints; locking and bolting components; contact surfaces; and the reactor vessel interior. Next, a flow test was conducted on the reactor vessel internals during the HFT. A post-HFT inspection was then performed on the reactor internals to check for observable damage or loose parts. These inspections are documented on data sheets as attachments to Reference 1 as documented in Reference 2. The test and inspections, described in UFSAR Section 3.9.2.4, were performed consistent with the guidelines of Regulatory Guide 1.20, Rev 2.

The inspection results, as documented in the Unit 3 ITAAC Technical Report (ITR) (Reference 3), conclude the as-built reactor internals have no observable damage or loose parts.

10. At least eight capsules are in the reactor lower internals assembly.

An inspection of the reactor lower internals assembly was performed to confirm that at least eight material surveillance specimen capsules were installed in holders for that purpose, in accordance with the installation manuals. These inspections were documented on data sheets included in the ITR (Reference 3).

The inspection results, as documented in the Unit 3 ITR (Reference 3), conclude that at least eight capsules are in the reactor lower internals assembly.

References 2 and 3 provide evidence that the ITAAC Acceptance Criteria requirements are met:

- The as-built reactor internals have no observable damage or loose parts; and
- At least eight capsules are in the reactor lower internals assembly.

References 1 through 3 are available for NRC inspection as part of the Unit 3 ITAAC 2.1.03.07.i Completion Package (Reference 4).

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 2.1.03.07.i (Reference 4) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.1.03.07.i 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. 3-RXS-ITPP-501, Rev. 3.1, "Pre- and Post-Hot Functional Test Inspection of Reactor Vessel Internals"
2. Work Order 1061754, Rev. 0, "(ITAAC) Perform preop testing per 3-RXS-ITPP-501, Pre and Post – Pre-core Hot Functional Inspection of the Reactor Vessel Internals"
3. SV3-RXS-ITR-800078, Rev. 1, "Unit 3 Recorded Results of PXS Flow Induced Vibration and RXS Sample Specimen Inspections: ITAAC 2.1.03.07.i"
4. 2.1.03.07.i-U3-CP-Rev0, ITAAC Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"