

Docket No.: 52-026

ND-20-1188  
10 CFR 52.99(c)(1)

U.S. Nuclear Regulatory Commission  
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Southern Nuclear Operating Company  
Vogtle Electric Generating Plant Unit 4  
ITAAC Closure Notification on Completion of ITAAC 2.2.03.08c.xii [Index Number 197]

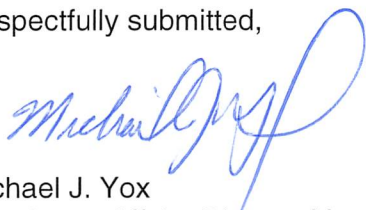
Ladies and Gentlemen:

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 4 Inspections, Tests, Analyses, and Acceptance Criteria ITAAC item ITAAC 2.2.03.08c.xii [Index Number 197]. This ITAAC verified that the downward slope of the CMT level sensors (PXS -11A/B/D/C, PXS -12A/B/C/D, PXS -13A/B/C/D, PXS -14A/B/C/D) upper level tap lines each have a downward slope of  $\geq 2.4$  degrees from the centerline of the connection to the CMT to the centerline of the connection to the standpipe. 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 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 of ITAAC 2.2.03.08c.xii [Index Number 197]

MJY/JFV/sfr

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**Southern Nuclear Operating Company  
ND-20-1188  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 4  
Completion of ITAAC 2.2.03.08c.xii [Index Number 197]**

### **ITAAC Statement**

#### **Design Commitment:**

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

#### **Inspections, Tests, Analyses:**

xii) Inspections will be conducted of the CMT level sensors (PXS-11A/B/D/C, - 12A/B/C/D, - 13A/B/C/D, - 14A/B/C/D) upper level tap lines.

#### **Acceptance Criteria:**

xii) Each upper level tap line has a downward slope of  $\geq 2.4$  degrees from the centerline of the connection to the CMT to the centerline of the connection to the standpipe.

### **ITAAC Determination Basis**

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 inspections to be performed of each Core Makeup Tank (CMT) level sensors (PXS-11A/B/D/C, -12A/B/C/D, -13A/B/C/D, -14A/B/C/D) upper level tap lines to verify that each upper level tap line has a downward slope of  $\geq 2.4$  degrees from the centerline of the connection to the CMT to the centerline of the connection to the standpipe.

An inspection of the installed CMT level sensors upper level tap lines was performed using survey equipment in accordance with site survey and measurement procedures (Reference 1). The inspection was performed using specified survey locations and common reference points to measure the elevation and distance of each upper level tap line from the centerline of the connection to the CMT to the centerline of the connection to the standpipe. The survey measurements were recorded and used to calculate the as-built slope of each of the upper level tap line to ensure it meets the acceptance criteria.

The inspection results are shown in Attachment A and documented in the ITAAC Technical Report (Reference 2), which confirmed that each upper level tap line has a downward slope of  $\geq 2.4$  degrees from the centerline of the connection to the CMT to the centerline of the connection to the standpipe and meets the ITAAC acceptance criteria.

Reference 2 is available for NRC inspection as part of the Unit 4 ITAAC 2.2.03.08c.xii 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 ITAAC findings pertaining to the subject ITAAC and associated corrective actions. This review found that there are no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.2.03.08c.xii (Reference 3) and is available for NRC review.

**ITAAC Completion Statement**

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.2.03.08c.xii was performed for VEGP Unit 4 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. 26139-000-4MP-T81C-N3201, Rev. 7, Construction Survey
2. SV4-PXS-ITR-900197, Unit 4 Inspection of the PXS CMT Upper Level Tap Lines: ITAAC 2.2.03.08c.xii NRC Number 197, Revision 1
3. 2.2.03.08c.xii-U4-CP-Rev0, Completion Package
4. SV4-PXS-M6-001, Rev. 7, Piping and Instrumentation Diagram Passive Core Cooling System
5. NEI 08-01, Industry Guideline for the ITAAC Closure Process under 10 CFR Part 52

### Attachment A

CMT level sensors upper level tap line downward slope  
(Acceptance criteria  $\geq 2.4$  degrees)

<b>CMT*</b>	<b>CMT Level Sensor*</b>	<b>CMT Level Sensor Standpipe+</b>	<b>Upper Level Tap Line++</b>	<b>Unit 4 Calculated as-built slope (degrees)</b>
PXS-MT-02A	PXS-11A/C	PXS-MY-Y11A	PXS-PL-L082A	7.8 (max) - 2.5 (min)
	PXS-11B/D	PXS-MY-Y12A	PXS-PL-L086A	5.6 (max) - 2.6 (min)
	PXS-13A/C	PXS-MY-Y13A	PXS-PL-L092A	4.5 (max) - 2.8 (min)
	PXS-13B/D	PXS-MY-Y14A	PXS-PL-L096A	4.2 (max) - 2.5 (min)
PXS-MT-02B	PXS-12A/C	PXS-MY-Y12B	PXS-PL-L082B	4.0 (max) - 2.5 (min)
	PXS-12B/D	PXS-MY-Y11B	PXS-PL-L086B	3.4 (max) - 2.4 (min)
	PXS-14A/C	PXS-MY-Y14B	PXS-PL-L092B	3.4 (max) - 2.4 (min)
	PXS-14B/D	PXS-MY-Y13B	PXS-PL-L096B	3.9 (max) - 3.1 (min)

\* Excerpt from COL Appendix C Table 2.2.3-1

+ Excerpt from UFSAR Table 3.2-3

++ Reference 5, Piping & Instrumentation Drawing SV4-PXS-M6-001