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U.S. Nuclear Regulatory Commission  
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Southern Nuclear Operating Company  
Vogtle Electric Generating Plant Unit 3  
ITAAC Closure Notification on Completion of ITAAC 2.6.09.05c [Index Number 646]

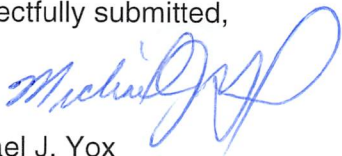
Ladies and Gentlemen:

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 2.6.09.05c [Index Number 646]. This ITAAC confirms that the central and secondary alarm stations are designed and equipped such that, in the event of a single act, in accordance with the design basis threat of radiological sabotage, equipment needed to maintain the functional capability of either alarm station to detect and assess alarms and communicate with onsite and offsite response personnel exists. 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 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion of ITAAC 2.6.09.05c [Index Number 646]

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**Southern Nuclear Operating Company  
ND-21-0271  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion of ITAAC 2.6.09.05c [Index Number 646]**

## **ITAAC Statement**

### **Design Commitment**

5.c) The central and secondary alarm stations are designed and equipped such that, in the event of a single act, in accordance with the design basis threat of radiological sabotage, the design enables the survivability of equipment needed to maintain the functional capability of either alarm station to detect and assess alarms and communicate with onsite and offsite response personnel.

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

Inspections and/or analysis of the central and secondary alarm station will be performed.

### **Acceptance Criteria**

The central and secondary alarm stations are designed and equipped such that, in the event of a single act, in accordance with the design basis threat of radiological sabotage, equipment needed to maintain the functional capability of either alarm station to detect and assess alarms and communicate with onsite and offsite response personnel exists.

## **ITAAC Determination Basis**

Inspections and analysis of the central alarm station (CAS) and the secondary alarm station (SAS) were performed to verify CAS and SAS are designed and equipped such that, in the event of a single act, in accordance with the design basis threat of radiological sabotage, equipment needed to maintain the functional capability of either alarm station to detect and assess alarms and communicate with onsite and offsite response personnel exists and satisfies the applicable single act, design basis threat requirements of the VEGP Unit 3 and Unit 4 Physical Security Plan associated with 10 CFR 73.55(i)(4)(i). The VEGP Unit 3 Plant Security System ITAACs only cover the Unit 3 plant security system design commitment scope. The CAS and SAS are designed to be functionally equivalent and redundant, such that the functions needed to detect and assess alarms, and initiate response of both onsite and offsite security forces, is available in each location. The redundant design and spatial separation of CAS and SAS assure that no single act by the design basis threat described in 10 CFR 73.1(a)(1) and detailed in Regulatory Guide 5.69 (Reference 1) would disable both alarm stations.

Reference 2 performed a standard plant single act design assessment of CAS and SAS to verify that the AP1000 standard plant is protected against the single act in accordance with the design basis threat of radiological sabotage as required by 10 CFR 73.55(i)(4)(i). The assessment concluded that at least one alarm station maintains the ability to detect and assess alarms, initiate and coordinate an adequate response to an alarm, summon offsite assistance, and provide command and control.

Reference 3 performed a site-specific assessment of VEGP Unit 3 to confirm that no single act, in accordance with the design basis threat of radiological sabotage, can disable the function of both CAS and SAS as required by 10 CFR 73.55(i)(4)(i).

ITAAC Technical Report SV3-SES-ITR-800646 (Reference 4) documents inspections performed of the as-built physical security system using construction drawings, testing documentation, and walkdowns to assess CAS/SAS structure location and layout, security computer location, intrusion detection equipment, alarm and assessment equipment, security system data and power supply/backup power supply infrastructure, onsite and offsite security communications equipment,

security command and control communications equipment, and component redundancy to verify that the as-built physical security system installation is consistent with the Reference 2 standard plant physical security system design assessment assumptions, as modified by the Reference 3 site-specific assessment.

The inspection and analysis results are documented in References 2 through 4 and verify that CAS and SAS are designed and equipped such that, in the event of a single act, in accordance with the design basis threat of radiological sabotage, equipment needed to maintain the functional capability of either alarm station to detect and assess alarms and communicate with onsite and offsite response personnel exists.

References 2 through 4 are available for NRC inspection as part of the Unit 3 ITAAC 2.6.09.05c Completion Package (Reference 5).

### **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 2.6.09.05c (Reference 5) and is available for NRC review.

### **ITAAC Completion Statement**

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.6.09.05c was performed for VEGP Unit 3 and that the prescribed acceptance criteria was 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. Regulatory Guide 5.69, Guidance for the Application of Radiological Sabotage Design-Basis Threat in the Design, Development and Implementation of a Physical Security Program that Meets 10 CFR 73.55 Requirements, Rev 0 (Safeguards Information)
2. APP-SES-Z0C-001, CAS & SAS Single Act Assessment, Rev 1 (Security Related Information)
3. SV0-SES-Z0C-800000, Vogtle Site CAS and SAS Single Act Assessment, Rev 0, (Security Related Information)
4. SV3-SES-ITR-800646, SES Alarm Stations Single Act Survivability: ITAAC 2.6.09.05c, Rev 0, (Security Related Information)
5. 2.6.09.05c-U3-CP-Rev0, ITAAC Completion Package