



Jamie M. Coleman
Regulatory Affairs Director
Vogtle 3 & 4

7825 River Road
Waynesboro, GA 30830
706-848-6926 tel

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10 CFR 52.99(c)(1)

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3
Resubmittal of ITAAC Closure Notification on Completion of
ITAAC 3.3.00.07d.iv.b [Index Number 807]

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 3.3.00.07d.iv.b [Index Number 807]. This ITAAC verified that for the non-radiologically controlled area of the auxiliary building where spatial separation distance is less than specified, an analysis has been performed and demonstrates that the Class 1E cables will still perform their design function.

Southern Nuclear Operating Company (SNC) previously submitted ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.b [Index Number 807], letter number ND-21-0872, dated October 7, 2021 [ML21280A316]. This resubmittal includes additional analyses to support the completion of the subject ITAAC and supercedes ND-21-0872 in its entirety.

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 is 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,

Jamie M. Coleman
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC 3.3.00.07d.iv.b [Index Number 807]

JMC/CMK/sfr

To:

Southern Nuclear Operating Company/ Georgia Power Company

Mr. Peter P. Sena III

Mr. D. L. McKinney

Mr. H. Nieh

Mr. G. Chick

Mr. S. Stimac

Mr. P. Martino

Mr. D. Pitts

Mr. J.B. Williams

Mr. A. S. Parton

Ms. K. A. Roberts

Ms. J.M. Coleman

Mr. C. T. Defnall

Mr. C. E. Morrow

Mr. K. J. Drudy

Mr. J. M. Fisher

Mr. R. L. Beilke

Mr. S. Leighty

Ms. A. C. Chamberlain

Mr. J. C. Haswell

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Nuclear Regulatory Commission

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Ms. A. Veil

Mr. C. P. Patel

Mr. G. J. Khouri

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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
Mr. D. C. Durham
Mr. M. M. Corletti
Mr. Z. S. Harper
Ms. S.L. Zwack

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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Vogtle Electric Generating Plant (VEGP) Unit 3
ITAAC Closure Notification on Completion of ITAAC 3.3.00.07d.iv.b [Index Number 807]

ITAAC Statement

Design Commitment

7.d) Physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables.

Inspections, Tests, Analyses

Inspections of the as-built raceways that route Class 1E cables will be performed to confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following:

iv) Separation distances less than those specified above and not run in enclosed raceways or provided with barriers are based on analysis

Acceptance Criteria

Results of the inspection will confirm that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following:

iv.b) For areas in the non-radiologically controlled area of the auxiliary building, a report exists and concludes that separation distances less than those specified above and not provided with enclosed raceways or barriers have been analyzed.

ITAAC Determination Basis

Multiple ITAAC are performed to ensure that physical separation is maintained between Class 1E divisions and between Class 1E divisions and non-Class 1E cables. In accordance with this ITAAC, separation distances for circuits that do not meet the criteria of ITAAC 3.3.00.07d.ii.b [Index 801] or ITAAC 3.3.00.07d.iii.b [Index 804] may be based on analyses. For circuits that have separation distances based on analyses, the subject ITAAC requires inspections to confirm that separation distances have been analyzed. The Class 1E cables and raceways and non-Class 1E cables in the non-radiologically controlled area of the auxiliary building are designed to be appropriately separated in accordance with APP-GW-E1-001 (Reference 1). Installation specifications provided to the constructor identify separation criteria, consistent with the ITAAC commitment.

Class 1E electrical cables and raceways are required to be installed in accordance with design drawings, installation specifications issued for construction and work package requirements. Completed raceway installation, in-progress and completed cable installation, and completed cable terminations are inspected to ensure the separation installation specifications are satisfied. Inspections are performed in accordance with the Construction Quality Verification Program 26139-000-4MP-T81C-N7101 (Reference 2). ITAAC 3.3.00.07d.ii.b [Index 801] will confirm that inspection records are completed to document the satisfactory separation between

raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables.

Cable Separation Report for Analyses (Reference 8) confirmed that the separation between raceways that route Class 1E cables of different divisions, and between raceways that route Class 1E cables and raceways that route non-Class 1E cables is consistent with the following:

For areas in the non-radiologically controlled area of the auxiliary building, separation distances less than those specified above (i.e. in the COL) and not provided with enclosed raceways or barriers have been analyzed. The analyses performed for this ITAAC are performed in accordance with standard IEEE 384-1981, and demonstrates that the effects of lesser separation for non-Class 1E fiber optic linear heat detection system cables within safety related cable trays, non-fully enclosed raceway/free air cable drops from their raceways to all the PMS cabinets, rod drive power system cables, and leaky coax cables do not impact the ability of Class 1E circuits to perform their safety related functions (References 3 through 7).

Exceptions to the subject ITAAC are not included within the scope of this ITAAC and are addressed within the scope of ITAAC 3.3.00.07d.v.b [Index 810].

References 1 through 8 are available for NRC inspection, as well as the Unit 3 ITAAC 3.3.00.07d.iv.b Completion Package (Reference 9).

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all ITAAC findings and associated corrective actions. This review found no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 3.3.00.07d.iv.b (Reference 9) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 3.3.00.07d.iv.b was performed for VEGP Unit 3 and that the prescribed acceptance criteria are 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. APP-GW-E1-001, "Electrical Systems Design Criteria"
2. 26139-000-4MP-T81C-N7101, "Bechtel Construction Quality Verification Program"
3. WNA-AR-00516-WAPP, "AP1000 Protection and Safety System Monitoring System Separation Analysis"
4. APP-GW-E0R-006, "IEEE 384 Design Compliance Description"
5. APP-GW-GEF-850316, "Design Evaluations for Compliance with IEEE 384 Spatial Separation"
6. APP-PLS-E0C-003, "Evaluation of the Electrical Separation of Low Voltage Rod Drive Power Cables"
7. APP-G1-GEF-850217, "Leaky Coax Cable IEEE 384 Separation Evaluation"
8. SV3-CSR-ITR-800807 Rev 2, "Unit 3 Cable Separation Report for Analyses"
9. 3.3.00.07d.iv.b-U3-CP-Rev1, "ITAAC Completion Package"