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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 3.3.00.07c.i.a [Index Number 795]

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 3.3.00.07c.i.a [Index Number 795]. This ITAAC verified separation is maintained between Class 1E divisions in accordance with the fire areas as identified in Combined License, Appendix C, Table 3.3-3 in the non-radiologically controlled area of the auxiliary building. 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,

A handwritten signature in black ink that reads "Kelli Roberts for SNC". The signature is written in a cursive, flowing style.

Jamie M. Coleman  
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion of ITAAC 3.3.00.07c.i.a [Index Number 795]

JMC/CMK/sfr

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**Southern Nuclear Operating Company**  
**ND-21-0294**  
**Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3**  
**ITAAC Closure Notification on Completion of ITAAC 3.3.00.07c.i.a [Index Number 795]**

## **ITAAC Statement**

### **Design Commitment**

7.c) Separation is maintained between Class 1E divisions in accordance with the fire areas as identified in Table 3.3-3.

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

i) Inspections of the as-built Class 1E division electrical cables, as-built communication cables associated with only one division, and the as-built raceways that route the Class 1E divisional electrical cables and communication cables located in the fire areas identified in Table 3.3-3 will be conducted.

### **Acceptance Criteria**

i.a) Results of the inspection will confirm that the separation between Class 1E divisions in the non-radiologically controlled area of the auxiliary building is consistent with Table 3.3-3.

## **ITAAC Determination Basis**

Multiple ITAAC are performed to ensure that separation is maintained between Class 1E divisions in accordance with the fire areas as identified in Table 3.3-3. This ITAAC requires inspections of the as-built Class 1E division electrical cables, as-built communication cables associated with only one division, and the as-built raceways that route the Class 1E divisional electrical cables and communication cables located in the fire areas identified in Table 3.3-3 in the non-radiologically controlled area of the auxiliary building be conducted to confirm that the separation between Class 1E divisions is consistent with Table 3.3-3. The Class 1E divisions inside the non-radiologically controlled area of the auxiliary building described in Combined License (COL) Appendix C Table 3.3-3 (Attachment A) are designed to be appropriately separated in accordance with APP-GW-E1-001 (Reference 1). Installation specifications provided to the constructor identify the separation criteria, consistent with the ITAAC commitment.

Class 1E division electrical cables, communication cables, and raceways were 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 were inspected to ensure the separation installation specifications are satisfied. Inspections were performed in accordance with the Construction Quality Verification Program, 26139-000-4MP-T81C-N7101 (Reference 2), or the Quality Control Inspection Program, ND-EN-VNP-020 (Reference 5). The completed inspection records document the satisfactory separation between Class 1E divisions in the non-radiologically controlled area of the auxiliary building consistent with COL Appendix C Table 3.3-3.

Reference 3 identifies the inspection reports associated with the cable and raceway separation inspections and confirms that the separation between Class 1E divisions in the non-



radiologically controlled area of the auxiliary building is consistent with COL Appendix C Table 3.3-3.

Reference 3 is available for NRC inspection as part of the Unit 3 ITAAC 3.3.00.07c.i.a 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 ITAAC findings and associated corrective actions. This review found no relevant ITAAC findings associated with this ITAAC and is documented in Reference 4. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 3.3.00.07c.i.a (Reference 4) and is available for NRC review.

### **ITAAC Completion Statement**

Based on the above information, SNC hereby notifies the NRC that ITAAC 3.3.00.07c.i.a 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, Construction Quality Verification Program
3. SV3-1200-ITR-AUXNRDIR, Unit 3 Cable and Raceway Report for the Non-Radiologically Controlled Area of the Auxiliary Building
4. 3.3.00.07c.i.a-U3-CP-Rev0, ITAAC Completion Package
5. ND-EN-VNP-020, Quality Control Inspection Program

### Attachment A

#### Class 1E Divisions in Auxiliary Building Non-Radiologically Controlled Fire Areas\*

| Fire Area Number | Class 1E Divisions |              |              |              |
|------------------|--------------------|--------------|--------------|--------------|
|                  | A                  | C            | B            | D            |
| 1200 AF 03       | Yes                | Yes          | --           | --           |
| 1201 AF 02       | --<br>Note 2       | --<br>Note 2 | Yes          | Yes          |
| 1201 AF 03       | --<br>Note 2       | --<br>Note 2 | Yes          | Yes          |
| 1201 AF 04       | --                 | --           | Yes          | Yes          |
| 1201 AF 05       | --                 | --           | Yes          | Yes          |
| 1201 AF 06       | --                 | --           | Yes          | Yes          |
| 1202 AF 03       | --<br>Note 2       | Yes          | --<br>Note 2 | --<br>Note 2 |
| 1202 AF 04       | Yes                | --<br>Note 2 | --<br>Note 2 | --<br>Note 2 |
| 1220 AF 01       | --                 | --           | Yes          | Yes          |
| 1230 AF 01       | Yes                | Yes          | --           | --           |
| 1230 AF 02       | --                 | --           | Yes          | Yes          |
| 1240 AF 01       | Yes                | Yes          | --           | --           |
| 1242 AF 02       | Yes                | Yes          | --           | --           |
| 1250 AF 01       | Yes                | Yes          | --           | --           |

#### Notes:

Note 1: Dash (--) indicates not applicable

Note 2: Cables from this division in this fire area are limited to interdivisional cables terminating in this fire area.

\*Excerpt from COL Appendix C Table 3.3-3