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Docket No.: 52-025

**SEP 28 2016**

ND-16-1886  
10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555-0001

Southern Nuclear Operating Company  
Vogtle Electric Generating Plant Unit 3  
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load  
Item 3.3.00.02b [Index Number 770]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of September 30, 2016, Vogtle Electric Generating Plant (VEGP) Unit 3 Uncompleted Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) Item 3.3.00.02b [Index Number 770] has not been completed greater than 225-days prior to initial fuel load. Enclosure 1 describes the plan for completing ITAAC 3.3.00.02b [Index Number 770]. Southern Nuclear Operating Company will at a later date provide additional notifications for ITAAC that have not been completed 225-days prior to initial fuel load.

This notification is informed by 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. In accordance with NEI 08-01, this notification includes ITAAC for which required inspections, tests, or analyses have not been performed or have been only partially completed. All ITAAC will be fully completed and all Section 52.99(c)(1) ITAAC Closure Notifications will be submitted to NRC to support the Commission finding that all acceptance criteria are met prior to plant operation, as required by 10 CFR 52.103(g).

This letter contains no new NRC regulatory commitments.

If there are any questions, please contact David Woods at 706-848-6903.

Respectfully submitted,

  
Michael J. Yox  
Regulatory Affairs Director Vogtle 3&4

MJY/KMS/amm

**Enclosure:**

1. Vogtle Electric Generating Plant (VEGP) Unit 3 Completion Plan for Uncompleted ITAAC  
Item 3.3.00.02b [Index Number 770]

**To:**

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ND-16-1886  
Enclosure 1  
Completion Plan

**Southern Nuclear Operating Company**

**ND-16-1886**

**Enclosure 1**

**Vogtle Electric Generating Plant (VEGP) Unit 3**

**Completion Plan for Uncompleted ITAAC  
Item 3.3.00.02b [Index No. 770]**

**Subject: Uncompleted ITAAC 3.3.00.02b [Index No. 770]**

### **ITAAC Statement**

#### **Design Commitment**

*2.b) Site grade level is located relative to floor elevation 100'-0" per Table 3.3-5.*

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

*Inspection of the as-built site grade will be conducted.*

#### **Acceptance Criteria**

*Site grade is consistent with design plant grade within the dimension defined on Table 3.3-5.*

### **ITAAC Completion Description**

Inspection of the as-built site grade is conducted to confirm that the site grade is consistent with design plant grade within the dimension defined on VEGP Unit 3 Combined License (COL) Appendix C Table 3.3-5, row 10 (Attachment A). VEGP Unit 3 COL Appendix C Section 1.1, Definitions, defines site grade as the as-built elevation of the soil to the west side of the nuclear island, and design plant grade as the elevation of the soil around the nuclear island assumed in the design of the AP1000, i.e., floor elevation 100'-0".

A licensed professional surveyor performs a topographic survey of the as-built site grade. Results of the topographical survey are compared to the design plant grade to determine that the site grade is consistent with design plant grade.

The as-built site grade inspection result is documented in Principal Closure Document XXX (Reference 1) supporting the ITAAC 3.3.00.02b Completion Package (Reference 2) and determined that the as-built site grade elevation relative to floor elevation 100'-0" is x ft-yy in. The inspection result verifies that the as-built site grade is consistent with the design plant grade within the dimension defined in Attachment A.

Principal Closure Document XXX is available for NRC inspection as part of the ITAAC 3.3.00.02b Completion Package.

### **List of ITAAC Findings**

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.

### **References (available for NRC inspection)**

1. Principal Closure Document XXX
2. ITAAC 3.3.00.02b Completion Package
3. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Attachment A: Excerpt from VEGP Unit 3 COL Appendix C - Table 3.3-5**

<b>Key Dimension</b>	<b>Nominal Dimension</b>	<b>Tolerance</b>
Distance of Design Plant Grade (Floor elevation 100'-0") relative to Site Grade	0 ft	$\pm 3$ ft-6 in