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APR 1 3 2018

Docket Nos.: 52-025
52-026

ND-18-0498
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 and Unit 4
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load
Item 2.2.03.08c.xii [Index Number 197]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of April 6, 2018, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.03.08c.xii [Index Number 197] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing this ITAAC. 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 Tom Petrak at 706-848-1575.

Respectfully submitted,

Michael J. Yox
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.2.03.08c.xii [Index Number 197]

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Southern Nuclear Operating Company
ND-18-0498
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted 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 ≥ 2.4 degrees from the centerline of the connection to the CMT to the centerline of the connection to the standpipe.

ITAAC Completion Description

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 ≥ 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 is performed using survey equipment in accordance with site survey and measurement procedures. The inspection is 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 are recorded and used to calculate the as-built slope of each upper level tap line to ensure it meets the acceptance criteria.

The inspection results are shown in Attachment A and documented in the Unit 3 and Unit 4 Principal Closure Documents (References 1 and 2, respectively) which confirm that each upper level tap line has a downward slope of ≥ 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.

References 1 and 2 are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.2.03.08c.xii Completion Packages (References 3 and 4, respectively).

List of ITAAC Findings

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.

References (available for NRC inspection)

1. Principal Closure Document XXX (Unit 3)
2. Principal Closure Document YYY (Unit 4)
3. 2.2.03.08c.xii-U3-CP-Rev X, "Completion Package for the Unit 3 ITAAC 2.2.03.08c.xii [Index Number 197]"
4. 2.2.03.08c.xii-U4-CP-Rev X, "Completion Package for the Unit 4 ITAAC 2.2.03.08c.xii [Index Number 197]"
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 slope
(Acceptance criteria ≥ 2.4 degrees)

CMT*	CMT Level Sensor*	CMT Level Sensor Standpipe+	Upper Level Tap Line++	Unit 3 Calculated as-built slope (degrees)	Unit 4 Calculated as-built slope (degrees)
PXS-MT-02A	PXS-11A/C	PXS-MY-Y11A	PXS-PL-L082A	x.x	y.y
	PXS-11B/D	PXS-MY-Y12A	PXS-PL-L086A	x.x	y.y
	PXS-13A/C	PXS-MY-Y13A	PXS-PL-L092A	x.x	y.y
	PXS-13B/D	PXS-MY-Y14A	PXS-PL-L096A	x.x	y.y
PXS-MT-02B	PXS-12A/C	PXS-MY-Y12B	PXS-PL-L082B	x.x	y.y
	PXS-12B/D	PXS-MY-Y11B	PXS-PL-L086B	x.x	y.y
	PXS-14A/C	PXS-MY-Y14B	PXS-PL-L092B	x.x	y.y
	PXS-14B/D	PXS-MY-Y13B	PXS-PL-L096B	x.x	y.y

* Excerpt from COL Appendic C Table 2.2.3-1
+Excerpt from UFSAR Table 3.2-3
++ Reference Piping & Instrumentation Drawing APP-PXS-M6-001