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APR 17 2018

Docket Nos.: 52-025
52-026

ND-18-0504
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 2.6.02.02b [Index Number 594]

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 2.6.02.02b [Index Number 594] 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 2.6.02.02b [Index Number 594]

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Document Services RTYPE: VND.LI.L06
File AR.01.02.06

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**Southern Nuclear Operating Company
ND-18-0504
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.6.02.02b [Index Number 594]**

ITAAC Statement

Design Commitment

2.b) Each EDS load group 1, 2, 3, and 4 battery supplies the corresponding dc switchboard bus load for a period of 2 hours without recharging.

Inspections, Tests, Analyses

Testing of each as-built battery will be performed by applying a simulated or real load, or a combination of simulated or real loads. The test will be conducted on a battery that has been fully charged and has been connected to a battery charger maintained at 135 ± 1 V for a period of no less than 24 hours prior to the test.

Acceptance Criteria

The battery terminal voltage is greater than or equal to 105 V after a period of no less than 2 hours, with an equivalent load greater than 850 amps.

ITAAC Completion Description

Testing is performed in accordance with Unit 3 and Unit 4 component test package work orders (References 1 and 2, respectively) to verify that each Non-Class 1E direct current (dc) and Uninterruptible Power Supply System (EDS) load group 1, 2, 3, and 4 battery supplies the corresponding dc switchboard bus load for a period of 2 hours without recharging.

A battery service test, as defined in Institute of Electrical and Electronics Engineers (IEEE) Standard 450-1995, is performed using a load bank to apply a load on the battery that results in a discharge current greater than 850 amps. The component test is performed on each fully charged as-built EDS battery that has been connected to a charger maintained at 135 ± 1 V for a period of no less than 24 hours prior to the test. The EDS battery is disconnected from the battery charger and a load bank is then connected to the output of the battery, adjusted to a discharge current greater than 850 amps. Discharge current and battery terminal voltage at the start of the test and upon completion of the 2-hour test are recorded on data sheets included in the component test package work orders (References 1 and 2). The EDS battery discharge current and terminal voltage measurements are summarized in Attachment A and demonstrate that each EDS battery meets the acceptance criteria.

The Unit 3 and Unit 4 component test results confirm the battery terminal voltage is greater than or equal to 105 V after a period of no less than 2 hours with an equivalent load greater than 850 amps.

The Unit 3 and Unit 4 component test package work orders (References 1 and 2) are available for NRC inspection as part of the Unit 3 and Unit 4 ITAAC 2.6.02.02b Completion Packages (References 3 and 4).

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 there are no relevant ITAAC findings associated with this ITAAC.

References (available for NRC inspection)

1. SNC921189, Rev. 0, "EDS Battery Load Test Test – ITAAC: SV3-2.6.02.02b"
2. SNCXXXXXX, Rev. X, "EDS Battery Load Test Test – ITAAC: SV4-2.6.02.02b"
3. 2.6.02.02b-U3-CP-Rev X "Completion Package for Unit 3 ITAAC 2.6.02.02b [Index Number 594]"
4. 2.6.02.02b-U4-CP-Rev X "Completion Package for Unit 4 ITAAC 2.6.02.02b [Index Number 594]"
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A

System: Non-Class 1E dc and Uninterruptible Power Supply System

Unit	Component Name*	Tag No.*	Pre-test Voltage & Time	Test Discharge Current, Voltage & Time at Start	Test Discharge Current, Voltage & Time at End (2+ Hours)
3	Load Group 1 Battery	EDS1-DB-1	XXX V hh:mm	XXX A YYY V hh:mm	XXX A YYY V hh:mm
3	Load Group 2 Battery	EDS2-DB-1	XXX V hh:mm	XXX A YYY V hh:mm	XXX A YYY V hh:mm
3	Load Group 3 Battery	EDS3-DB-1	XXX V hh:mm	XXX A YYY V hh:mm	XXX A YYY V hh:mm
3	Load Group 4 Battery	EDS4-DB-1	XXX V hh:mm	XXX A YYY V hh:mm	XXX A YYY V hh:mm
4	Load Group 1 Battery	EDS1-DB-1	XXX V hh:mm	XXX A YYY V hh:mm	XXX A YYY V hh:mm
4	Load Group 2 Battery	EDS2-DB-1	XXX V hh:mm	XXX A YYY V hh:mm	XXX A YYY V hh:mm
4	Load Group 3 Battery	EDS3-DB-1	XXX V hh:mm	XXX A YYY V hh:mm	XXX A YYY V hh:mm
4	Load Group 4 Battery	EDS4-DB-1	XXX V hh:mm	XXX A YYY V hh:mm	XXX A YYY V hh:mm

Notes:

* Excerpt from COL Appendix C, Table 2.6.2-2