Southern Nuclear

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10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission
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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 3.3.00.14 [Index Number 820]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of May 6, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 3.3.00.14 [Index Number 820] 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 & Unit 4
Completion Plan for Uncompleted ITAAC 3.3.00.14 [Index Number 820]

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**Southern Nuclear Operating Company**
**ND-19-0455**
**Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 & Unit 4**
**Completion Plan for Uncompleted ITAAC 3.3.00.14 [Index Number 820]**

## ITAAC Statement

Design Commitment

14. The external walls, doors, ceiling, and floors in the main control room, the central alarm station, and the secondary alarm station are bullet-resistant to at least Underwriters Laboratory Ballistic Standard 752, level 4.

Inspections/Tests/Analyses

Type test, analysis, or a combination of type test and analysis will be performed for the external walls, doors, ceilings, and floors in the main control room, the central alarm station, and the secondary alarm station.

Acceptance Criteria

A report exists and concludes that the external walls, doors, ceilings, and floors in the main control room, the central alarm station, and the secondary alarm station are bullet-resistant to at least Underwriters Laboratory Ballistic Standard 752, level 4.

## ITAAC Completion Description

A combination of type testing and analysis is performed for the external walls, doors, ceilings, and floors in the main control room (MCR), the central alarm station (CAS), and the secondary alarm station (SAS) to demonstrate that the external walls, doors, ceilings, and floors in the MCR, CAS, and SAS are bullet-resistant to at least Underwriters Laboratory Ballistic Standard 752 (UL 752), level 4 and satisfy the applicable bullet-resisting physical barrier requirements of the VEGP Unit 3 and Unit 4 Physical Security Plan associated with 10 CFR 73.55(e)(5). The VEGP Unit 3 (Unit 4) Plant Security System ITAACs only cover the Unit 3 (Unit 4) plant security system design commitment scope. The CAS and SAS are common to both VEGP Unit 3 and Unit 4.

Type testing is performed on the materials, used to construct the access doors to the MCR, CAS and SAS, to at least UL 752 Level 4 using guidance in Regulatory Guide 5.76 (Reference 1). The testing consists of discharging a weapon using the appropriate caliber ammunition at a sample of the protective material in a controlled environment and inspecting the protective material to ensure protection is provided against complete penetration, passage of fragments of projectiles, and spalling (fragmentation) of the protective material that could cause injury to a person standing directly behind the bullet-resisting barrier.

Analyses are performed to demonstrate that the as-built external walls, floors, and ceilings of the MCR, CAS and SAS meet bullet-resistant criteria. The analyses verify that the as-built attributes of the external walls, floors, and ceilings (e.g., concrete thickness, concrete compressive strength, etc.) meet the design attributes needed to ensure protection is provided against complete penetration, passage of fragments of projectiles, and spalling (fragmentation) of the protective material that could cause injury to a person standing directly behind the bullet-resisting barrier. Penetration openings in the MCR, CAS, and SAS external wall, floor and ceiling structures are either sealed with a high-density sealant, provided with a bullet resistant design (e.g., angled entry with steel shields) preventing direct line of sight to normally occupied areas of the MCR, CAS and SAS, the penetration itself is routed with angles or baffled within the wall, floor, or ceiling structure, or any combination thereof.

The results of the type testing and analyses are documented in Principal Closure Document XXX (Reference 2) and conclude that the external walls, doors, ceilings, and floors in the main control room, the central alarm station, and the secondary alarm station are bullet-resistant to at least UL 752, level 4.

Reference 2 is available for NRC inspection as part of the Unit 3 (Unit 4) ITAAC 3.3.00.14 Completion Package (Reference 3 [4]).

**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. Regulatory Guide 5.76, "Physical Protection Programs at Nuclear Power Reactors," July 2009
2. Principal Closure Document XXX, Central Alarm Station, Secondary Alarm Station, and Unit 3 (Unit 4) Main Control Room Bullet Resistant Summary Report
3. 3.3.00.14-U3-CP-Rev 0, ITAAC Completion Package
4. 3.3.00.14-U4-CP-Rev 0, ITAAC Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"