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ND-19-0609
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 2.1.03.09b [Index Number 83]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of July 3, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.1.03.09b [Index Number 83] 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 2.1.03.09b [Index Number 83]

MJY/RLB/sfr

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**Southern Nuclear Operating Company
ND-19-0609
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.1.03.09b [Index Number 83]**

ITAAC Statement

Design Commitment

9.b) The Class 1E components identified in Table 2.1.3-1 are powered from their respective Class 1E division.

Inspections/Tests/Analyses

Testing will be performed by providing simulated test signals in each Class 1E division.

Acceptance Criteria

A simulated test signal exists for Class 1E equipment identified in Table 2.1.3-1 when the assigned Class 1E division is provided the test signal.

ITAAC Completion Description

Testing is performed on the Class 1E components (equipment) identified in the VEGP Unit 3 and Unit 4 COL Appendix C Table 2.1.3-1 (Attachment A) to demonstrate they are powered from their respective Class 1E division. This ITAAC performs testing on the equipment identified in Table 2.1.3-1 by providing simulated test signals in each Class 1E division.

Class 1E power verification testing of the Protection and Safety Monitoring System (PMS) cabinets, that provide power to the equipment identified in Attachment A, is verified through ITAAC 2.5.02.05a component testing (Reference 1) and confirms the PMS cabinets are powered from their respective Class 1E division. Unit 3 and Unit 4 component test package work orders SNC922096 and SNCXXXXXX (References 2 and 3, respectively) document completion of power verification activities from the PMS cabinets to the equipment identified in Attachment A. References 2 and 3 first verify that power supply cables/wiring are installed and terminated from the applicable PMS cabinet to the respective component identified in Attachment A using approved construction drawings and cable/wiring termination documentation. References 2 and 3 then confirm, via cable/wiring termination inspection documentation, that continuity testing is performed on each of the installed cables/wiring to confirm current flow within the installed cable/wiring. The combination of cable/wiring installation and termination verification, with the installed cable/wiring continuity testing, confirms that the equipment identified in Appendix A is powered from its respective Class 1E division.

The Unit 3 and Unit 4 component test package work orders (References 2 and 3, respectively) confirm that a simulated test signal exists at the Class 1E equipment identified in Table 2.1.3-1 when the assigned Class 1E division is provided the test signal.

References 2 and 3 are available for NRC inspection as part of Unit 3 and Unit 4 ITAAC Completion Packages (References 4 and 5).

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. ITAAC 2.5.02.05a Closure Notification
2. SNC922096, "RXS Component Power Verification Test – ITAAC: SV3-2.1.03.09b"
3. SNCXXXXXX, "RXS Component Power Verification Test – ITAAC: SV4-2.1.03.09b"
4. 2.1.03.09b-U3-CP-Rev 0, ITAAC Completion Package
5. 2.1.03.09b-U4-CP-Rev 0, ITAAC Completion Package
6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A

COL Appendix C Table 2.1.3-1

Equipment Name*	Tag No.*
Source Range Detectors (4)	RXS-JE-NE001A/NE001B/NE001C/NE001D
Intermediate Range Detectors (4)	RXS-JE-NE002A/NE002B/NE002C/NE002D
Power Range Detectors – Lower (4)	RXS-JE-NE003A/NE003B/NE003C/NE003D
Power Range Detectors – Upper (4)	RXS-JE-NE004A/NE004B/NE004C/NE004D

* Excerpted from COL Appendix C Table 2.1.3-1