

Docket No.: 52-025  
52-026

ND-19-1262  
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 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 October 24, 2019, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 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.

Southern Nuclear Operating Company (SNC) previously submitted Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load for 3.3.00.02b [Index Number 770] ND-16-1886 [ML16272A324], dated September 28, 2016. This resubmittal supersedes letter number ND-16-1886 in its entirety.

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)(3) ITAAC Closure Notifications will be submitted to the NRC to support the Commission finding that all acceptance criteria are met prior to plant operation, as required by 10 CFR 52.103(g).

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 3.3.00.02b [Index No. 770]

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**Southern Nuclear Operating Company  
ND-19-1262  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC  
Item 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 Combined License (COL) Appendix C Table 3.3-5, row 10 (Attachment A). VEGP 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 equivalent to floor elevation 100'-0". The design plant grade for VEGP is defined as 220'-0" above mean sea level, which is equivalent to the 100'-0" elevation for the standard plant design.

An as-built site grade inspection is performed to demonstrate the as-built elevation of the area to the west side of the nuclear island is at the elevation of 100'-0" within a tolerance of  $\pm 3'-6"$ . This tolerance of  $\pm 3'-6"$  is based on seismic and soil structure interaction considerations for the Auxiliary Building, Shield Building, and Containment. The zone of influence of soil characteristics on the structural response of an embedded structure is generally considered to extend horizontally away from the structure the same distance as the depth of the embedment. For the AP1000 this distance is approximately 40 feet from the auxiliary and shield buildings. (Reference 1). The Power Block Grading Plan (Reference 2) has details of the site grading in the vicinity of the nuclear island, including local slope to encourage runoff away from the doorways of the buildings.

Per COL Appendix C definition of "As-Built", the physical properties of the structure, where technically justifiable, may be based on measurements prior to installation, provided that subsequent fabrication, handling, installation, and testing does not alter the properties.

The site grade is determined with a walkdown of surveyed locations of as-built structures that are at elevations of 100'-0" or lower (Attachment B and Figures 1A and 1B).

The inspection of as-built site grade is conducted by a survey of storm drain covers using the Power Block Grading Plan (Reference 2). Measurements are taken using survey equipment in accordance with site survey procedures (Reference 3). These storm drain covers measured elevations are compared to the Power Block Grading Plan to validate that the site grade

elevation areas west of the Nuclear Island are at site grade elevation relative to floor elevation of 100'-0" and within a tolerance of  $\pm 3'-6"$ .

The as-built site grade inspection results are documented in Attachment B and Principal Closure Document XXX (Reference 4) and determine that the as-built site grade elevation relative to floor elevation is 100'-0"  $\pm 3'-6"$ . The inspection result verifies that the as-built site grade is consistent with the design plant grade within the dimension defined in Table 3.3-5 (Attachment A).

Principal Closure Document XXX is available for NRC inspection as part of the ITAAC 3.3.00.02b Completion Package (Reference 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. NUREG-1793 Supplement 2, Final Safety Evaluation Report
2. SV0-0000-XG-800009, Power Block Grading Plan
3. 26139-000-4MP-T81C-N3201, "Construction Survey"
4. Principal Closure Document XXX
5. ITAAC 3.3.00.02b Completion Package
6. 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	± 3 ft-6 in

**Attachment B**

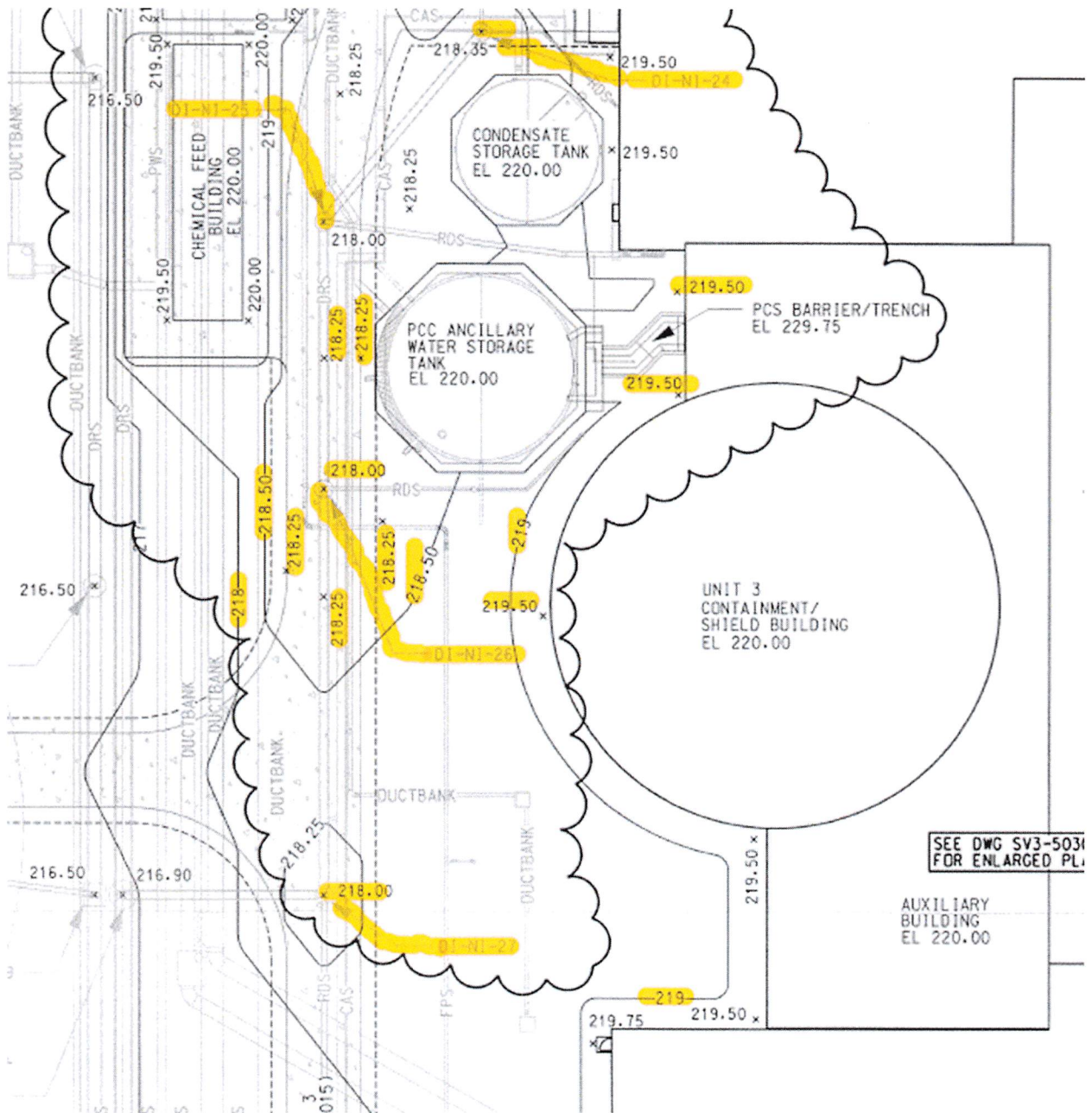
**Unit 3 Grading Plan Elevations for As-Built Structures**

<b>Location west of Nuclear Island</b>	<b>Distance from Nuclear Island (Approximate)</b>	<b>Site Grading Plan Elevation</b>	<b>Surveyed Elevation</b>	<b>Within ±3'- 6" Y/N</b>
Site Drainage cover plate DI-NI-24		218.35'	XXX.XX'	
Site Drainage cover plate DI-NI-25		218.00'	XXX.XX'	
Site Drainage cover plate DI-NI-26		218.00'	XXX.XX'	
Site Drainage cover plate DI-NI-27		218.00'	XXX.XX'	

**Unit 4 Grading Plan Elevations for As-Built Structures**

<b>Location west of Nuclear Island</b>	<b>Distance from Nuclear Island (Approximate)</b>	<b>Site Grading Plan Elevation</b>	<b>Surveyed Elevation</b>	<b>Within ±3'- 6" tolerance?</b>
Site Drainage cover plate DI-NI-15		218.35'	XXX.XX'	
Site Drainage cover plate DI-NI-16		218.00'	XXX.XX'	
Site Drainage cover plate DI-NI-17		218.00'	XXX.XX'	
Site Drainage cover plate DI-NI-19		218.00'	XXX.XX'	

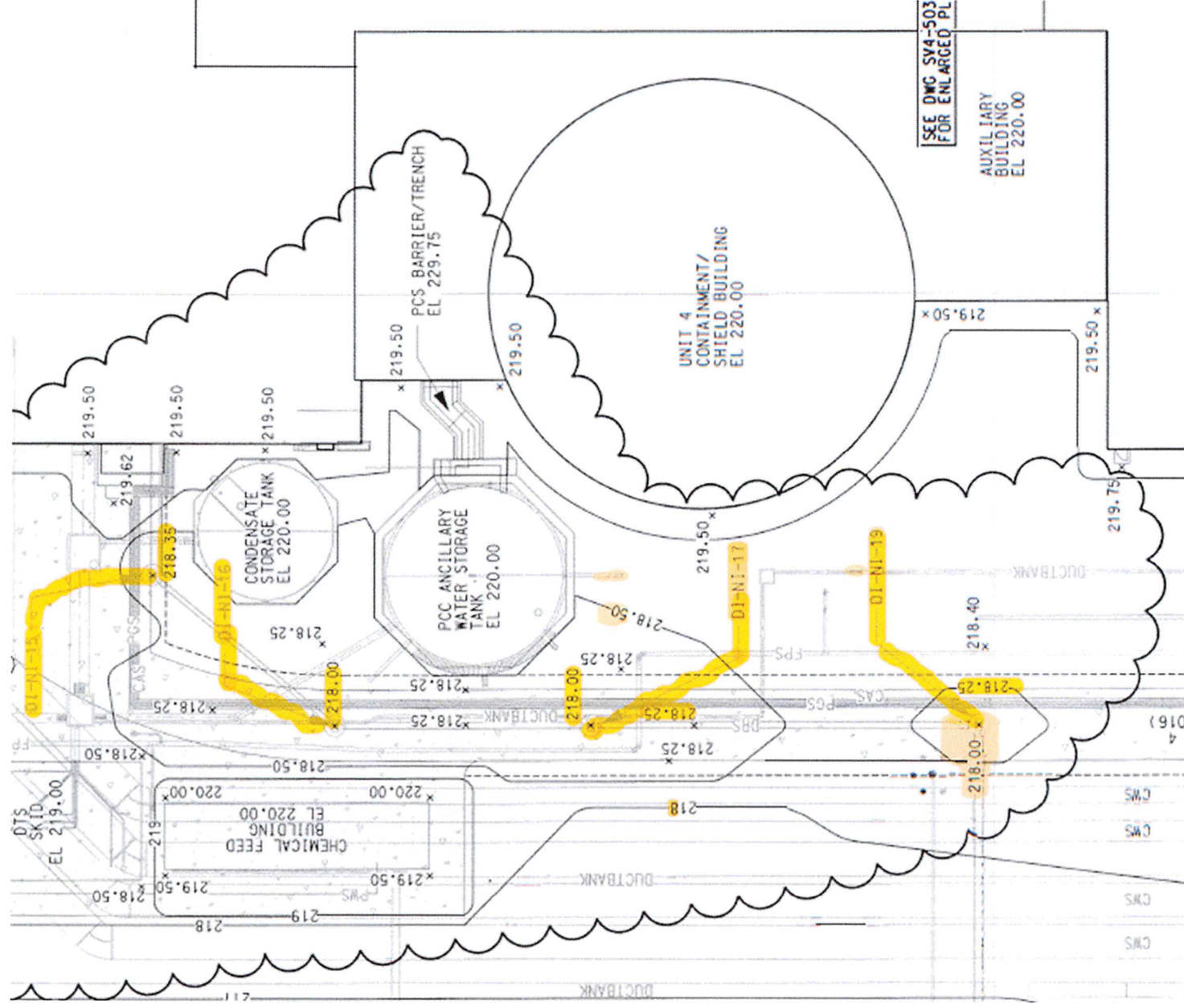
Figure 1A: Excerpt from Unit 3 Power Block Grading Plan with Locations\*



\* Excerpt from Reference 2



Figure 1B: Excerpt from Unit 4 Power Block Grading Plan with Locations\*



\* Excerpt from Reference 2