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ND-21-0242
10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission
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Southern Nuclear Operating
CompanyVogtle Electric
Generating Plant Unit 4
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load
Item 2.2.03.08c.iv.03 [Index Number 185]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of March 11, 2021, Vogtle Electric Generating Plant (VEGP) Unit 4 Uncompleted Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) Item 2.2.03.08c.iv.03 [Index Number 185] has not been completed greater than 225-days prior to initial fuel load. Enclosure 1 describes the plan for completing ITAAC 2.2.03.08c.iv.03 [Index Number 185]. 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 Kelli Roberts 706-848-6991.

Respectfully submitted,

Michael J. Yox
Regulatory Affairs Director Vogtle 3&4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4 Completion Plan for Uncompleted ITAAC Item 2.2.03.08c.iv.03 [Index Number 185]

MJY/RMS/sfr

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**Southern Nuclear Operating Company
ND-21-0242
Enclosure 1**

**Vogtle Electric Generating Plant (VEGP) Unit 4
Completion Plan for Uncompleted ITAAC Item 2.2.03.08c.iv.03 [Index No. 185]**

ITAAC Statement

Design Commitment

- 8.c) The PXS provides RCS makeup, boration, and safety injection during design basis events.

Inspections/Tests/Analyses

- iv) Inspections of the elevation of the following pipe lines will be conducted:
3. CMT discharge lines to DVI connection

Acceptance Criteria

- iv) The maximum elevation of the top inside surface of these lines is less than the elevation of:
3. CMT bottom inside surface

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 that inspections be conducted to verify that the maximum elevation of the top inside surface of the Core Makeup Tank (CMT) discharge lines to Direct Vessel Injection (DVI) connection is less than the elevation of CMT bottom inside surface.

The inspection of the CMT discharge lines to DVI connection top inside surface and the bottom inside tank surface of both CMTs (SV4-PXS-MT-02A and -02B) elevations is performed using survey equipment in accordance with site survey and measurement procedure (Reference 1). The conservative wall thickness, derived from installed pipe data, is subtracted from the top- of-pipe survey data to obtain the highest elevation of the inside surface of these lines. Additionally, calculations, based upon as-built manufacturer's data, combined with field measurements, are used to determine the elevation of the bottom inside surface of each CMT. The maximum derived elevation of the top inside surface of the CMT discharge lines to DVI connection is compared to the derived elevation of the bottom inside surfaces of each associated CMT using a common reference point.

The inspection results documented in Reference 2, verify that the maximum elevation of the CMT A discharge lines to DVI connection top inside surface is xxx feet, the maximum elevation of the CMT B discharge lines to DVI connection top inside surface is xxx feet, and the elevation of the CMT bottom inside surface is xxx feet and xxx feet for CMT A and B, respectively, which meets the ITAAC acceptance criteria.

References 1 and 2 are available for NRC inspection as well as the Unit 4 completion package (Reference 3).

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. 4MP-T81C-N3201, "Construction Survey"
2. SV4-PXS-FSK-xxxxxx, "As-Built CMT Discharge Pipe Elevation Comparison to CMT A & B Bottom Inside Surface Elevation"
3. 2.2.03.08c.iv.03-U4-CP-Rev0, "Completion Package for the Unit 4 ITAAC 2.2.03.08c.iv.03 [Index Number 185]"
4. NEI 08-01, "Industry Guidance for the ITAAC Closure Process under 10 CFR Part 52"