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ND-15-0299
10 CFR 52.99(c)(1)

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
Completion of ITAAC 2.2.03.08c.vi.02 [Index Number 190]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 4 Inspection, Test, Analysis and Acceptance Criteria (ITAAC) Item 2.2.03.08c.vi.02 [Index Number 190], for verifying the calculated volume of the Accumulator Tanks (ACCs) is greater than or equal to 2000 ft³. The closure process for this ITAAC is based on 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.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Paulo Albuquerque at 706-826-5531.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael J. Yox".

Michael J. Yox
Regulatory Affairs Director Vogtle 3&4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 2.2.03.08c.vi.02 [Index Number 190]

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Southern Nuclear Operating Company

ND-15-0299

Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 4

Completion of ITAAC 2.2.03.08c.vi.02 [Index Number 190]

ITAAC Statement

Design Commitment:

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

Inspections, Tests, Analyses:

vi) Inspections of each of the following tanks will be conducted:

2. Accumulators

Acceptance Criteria:

vi) The calculated volume of each of the following tanks is as follows:

2. Accumulators $\geq 2000 \text{ ft}^3$

ITAAC Determination Basis

Multiple ITAAC are performed to ensure the Passive Core Cooling System (PXS) provides Reactor Coolant System (RCS) makeup, boration, and safety injection during design basis events. This ITAAC requires an inspection of the Accumulator Tanks (ACCs) to confirm that the Accumulator volume is greater than or equal to $2,000 \text{ ft}^3$. Inspections of each of the ACCs were conducted to verify that the calculated volume of each of the ACCs is greater than or equal to $2,000 \text{ ft}^3$.

Measurements were performed on site using a laser scanner to determine that each tank's volume is greater than or equal to $2,000 \text{ ft}^3$. Two scanner locations were used within each tank to provide complete scanning coverage of the internal surface of the ACCs. One complete data file consisting of the composite of the scans, and representative of the entire internal surface of the ACC, was analyzed. Features not representative of the final tank configuration such as control point targets, cables, tripod and other features that are not part of the final operating tank condition were removed from the data file. Once the data represented a closed geometric shape, the volume was calculated from the model. The calculated volume of the Vogtle Unit 4, Accumulator A is $2,012.77 \text{ ft}^3$, and the Vogtle Unit 4, Accumulator B calculated volume is $2,016.83 \text{ ft}^3$. This is documented in the AP1000 Vogtle 4 Accumulator Tanks Volumetric Scanning Report (Reference 1).

ACC volume for both Vogtle Unit 4 ACCs is greater than or equal to $2,000 \text{ ft}^3$ and meets ITAAC 2.2.03.08c.vi.02 acceptance criteria.

ITAAC Finding Review

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 that there are no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the Vogtle Unit 4 ITAAC Completion Package for ITAAC 2.2.03.08c.vi.02 (Reference 2) and available for NRC inspection.

ITAAC Completion Statement

Based on the above information, Southern Nuclear hereby notifies the NRC that ITAAC 2.2.03.08c.vi.02 was performed for VEGP Unit 4 and that the prescribed acceptance criteria are met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. SV4-MT02-VDR-001, Revision 0, Vogtle 4 Accumulator Tanks Volumetric Scanning Report
2. SVP_SV0_003052, Submittal of Inspections, Test, Analyses and Acceptance Criteria (ITAAC) Completion Package for Unit 4 ITAAC 2.2.03.08c.vi.02 (190) (Verification of Accumulator Volume).