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U.S. Nuclear Regulatory Commission
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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3
ITAAC Closure Notification on
Completion of ITAAC 2.3.11.02.iii [Index Number 452]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 3 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.3.11.02.iii [Index Number 452] for verifying that a report exists and concludes that the as-built equipment including anchorage is seismically bounded by the tested or analyzed conditions. 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 706-848-5531.



Respectfully submitted,

Michael J. Yox
Regulatory Affairs Director Vogtle 3&4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC 2.3.11.02.iii [Index Number 452]

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**Southern Nuclear Operating Company
ND-15-2087
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC 2.3.11.02.iii [Index Number 452]**

ITAAC Statement

Design Commitment:

2. *The equipment identified as having seismic design requirements in Table 2.3.11-1 can withstand seismic design basis loads without loss of its structural integrity function.*

Inspections, Tests, Analyses:

- iii) *Inspection will be performed for the existence of a report verifying that the as-built equipment including anchorage is seismically bounded by the tested or analyzed conditions.*

Acceptance Criteria:

- iii) *A report exists and concludes that the as-built equipment including anchorage is seismically bounded by the tested or analyzed conditions.*

ITAAC Determination Basis

Multiple ITAAC are performed to confirm that the equipment identified as having seismic design requirements in VEGP Combined License (COL) Appendix C Table 2.3.11-1 (Appendix I) can withstand seismic design basis loads without loss of its structural integrity function. The subject ITAAC requires an inspection to be performed for the existence of a report that concludes that the as-built equipment, the Gaseous Radwaste System (WGS) Activated Carbon Delay Beds, including anchorage is seismically bounded by the tested or analyzed conditions.

The seismically designed WGS Activated Carbon Delay Beds and anchorage in VEGP COL Appendix C Table 2.3.11-1 were previously verified by analyses in accordance with ITAAC 2.3.11.02.ii (Reference 4) to be able to withstand appropriate seismic design basis loads.

In accordance with the fabrication and construction installation work packages, inspections were performed on the WGS Activated Carbon Delay Beds and anchorage to confirm the satisfactory installation of the seismically designed equipment. The inspection included verification of equipment fabrication, equipment mounting, equipment anchorage, and critical attributes from the seismic analyses. In accordance with NEI 08-01, Section 9.5, (Reference 1), inspection of WGS Activated Carbon Delay Bed equipment mounting and verification of critical attributes from the seismic analyses were performed at other than the final installed location due to inaccessibility of the equipment after installation. Non-conformances and design changes issued during fabrication and installation against the WGS Activated Carbon Delay Beds and anchorage were analyzed against the seismic analyses to ensure inspection results performed at other than the equipment's final location remained valid for supporting ITAAC acceptance criteria. Non-conformances and design changes issued up through installation of the equipment including attachment to the seismic Category 1 structure were analyzed against the seismic analysis to verify that the analyzed conditions were still bounding when considering the cumulative effects of any deviating conditions.

The results of the verifications were documented in the "Vogtle Unit 3 ITAAC 2.3.11.02.iii As-built Seismic Reconciliation Report" (Reference 2). The verifications demonstrated that the as-

built equipment in VEGP Unit 3 COL Appendix C Table 2.3.11-1 (Appendix I), including anchorage, is seismically bounded by the analyzed conditions.

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 document number is included in the Vogtle Unit 3 ITAAC Completion Package for ITAAC 2.3.11.02.iii (Reference 3) and available for NRC inspection.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.3.11.02.iii was performed for VEGP Unit 3 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. NEI 08-01 Revision 5, *Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52*
2. SV3-MV6H-VFR-001 Revision 0, Vogtle Unit 3 ITAAC 2.3.11.02.iii As-Built Seismic Reconciliation Report
3. SVP_SV0_003546, Attachment 1, Submittal of Inspections, Test, Analyses and Acceptance Criteria (ITAAC) Completion Package for Unit 3 ITAAC 2.3.11.02.iii (452) (Verification of As-Built Activated Carbon Delay Beds Seismic Design)
4. ND-15-0321, Southern Nuclear Operating Company Vogtle Electric Generating Plant Unit 3 ITAAC 2.3.11.02.ii ITAAC Closure Letter
5. VEGP 3&4 Tier 1 Revision 3.1

Appendix I

**ITAAC COMPLIANCE TABLE FOR SEISMIC DESIGNED EQUIPMENT LISTED IN VEGP
Unit 3 COL Appendix C Table 2.3.11-1**

SYSTEM: GASEOUS RADWASTE SYSTEM (WGS)

Equipment Name	Tag Number	Seismic Cat. I	As-Built Reconciliation Document
WGS Activated Carbon Delay Bed A	WGS-MV-02A	No ⁽¹⁾	SV3-MV6H-VFR-001
WGS Activated Carbon Delay Bed B	WGS-MV-02B	No ⁽¹⁾	SV3-MV6H-VFR-001

Note:

1. The WGS activated carbon delay beds (WGS-MV-02A and B) are designed to one-half SSE.