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10 CFR 52.99(c)(1)

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
ITAAC Closure Notification on Completion of ITAAC 3.2.00.08 [Index Number 757]

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 4 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 3.2.00.08 [Index Number 757] for verifying that a report exists and concludes that testing and analysis demonstrate that a licensed operator can achieve and maintain safe shutdown from the Remote Shutdown Workstation. 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 David Woods at 706-848-6903.

Respectfully submitted,

Michael J. Yox
Regulatory Affairs Director Vogtle 3&4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 3.2.00.08 [Index Number 757]

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**Southern Nuclear Operating Company
ND-16-0800
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC 3.2.00.08 [Index Number 757]**

ITAAC Statement

Design Commitment:

8. *The RSW and the available HSI permit execution of tasks by licensed operators to establish and maintain safe shutdown.*

Inspections, Tests, Analyses:

Test and analysis, using a workstation that physically represents the RSW and dynamically represents the RSW HSI and the operating characteristics and responses of the AP1000, will be performed.

Acceptance Criteria:

A report exists and concludes that the test and analysis results demonstrate that licensed operators can achieve and maintain safe shutdown conditions from the RSW.

ITAAC Determination Basis

Tests and analyses were performed to demonstrate the Remote Shutdown Workstation (RSW) and available Human System Interface (HSI) permit execution of tasks by licensed operators to establish and maintain safe shutdown.

During Integrated System Validation (ISV), qualified personnel performed a scenario using a representative RSW which dynamically represents the RSW HSI and the operating characteristics and responses of the AP1000. The scenario required the operators to perform the operational sequences for performing a plant shutdown and cooldown using the RSW. The results of ISV testing are documented in AP1000 Human Factors Engineering Integrated System Validation Report (Reference 1).

Following the completion of ISV, analysis of the results was performed based on the capabilities of the plant model demonstrated throughout ISV testing, the HSI interactions demonstrated by operators in the RSW scenario, and specific parameter data from the RSW scenario. This analysis is documented in Supplemental Analysis to Demonstrate Performance of the Acceptance Criteria for ITAAC 3.2.00.08 (Achieve and Maintain Safe Shutdown from the Remote Shutdown Workstation) (Reference 2).

The ISV report and supplemental analysis of the results conclude that licensed operators can achieve and maintain safe shutdown conditions from the RSW.

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 4 ITAAC Completion Package for ITAAC 3.2.00.08 (Reference 3) and available for NRC inspection.

Based on the above information, SNC hereby notifies the NRC that ITAAC 3.2.00.08 was performed for Vogtle 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. APP-OCS-GER-320, Rev. 1, AP1000 Human Factors Engineering Integrated System Validation Report
2. LTR-OPB-WAPP-16-084, Rev. 0, Supplemental Analysis to Demonstrate Performance of the Acceptance Criteria for ITAAC 3.2.00.08 (Achieve and Maintain Safe Shutdown from the Remote Shutdown Workstation)
3. SVP_SV0_003907, Submittal of Inspections, Tests, Analyses and Acceptance Criteria (ITAAC) Completion Package for Unit 4 ITAAC 3.2.00.08 [COL Index Number 757] (HFE - Safe Shutdown from RSW)