M. J. Yox
Regulatory Affairs Director
Vogtle 3&4
Nuclear Development

Southern Nuclear
Operating Company, Inc.
7825 River Road
Waynesboro, GA 30830

Tel 706.848.6459

SOUTHERN NUCLEAR
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Docket No.: 52-025

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ND-16-1851
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
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load
Item 2.3.02.14 [Index Number 317]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of September 30, 2016, Vogtle Electric Generating Plant (VEGP) Unit 3 Uncompleted Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) Item 2.3.02.14 [Index Number 317] has not been completed greater than 225-days prior to initial fuel load. Enclosure 1 describes the plan for completing ITAAC 2.3.02.14 [Index Number 317]. 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 David Woods at 706-848-6903.

Respectfully submitted,

Michael J. Yox
Regulatory Affairs Director Vogtle 3&4

MJY/KMS/amm

Enclosure:

1. Vogtle Electric Generating Plant (VEGP) Unit 3 Completion Plan for Uncompleted ITAAC Item 2.3.02.14 [Index Number 317]

To:
Southern Nuclear Operating Company/Georgia Power Company
Mr. S. E. Kuczynski (w/o enclosures)
Mr. D. A. Bost (w/o enclosures)
Mr. M. D. Meier
Mr. M. D. Rauckhorst (w/o enclosures)
Mr. D. H. Jones (w/o enclosures)
Ms. K. D. Fili
Mr. D. L. McKinney
Mr. B. H. Whitley
Mr. D. L. Fulton
Mr. C. E. Morrow
Mr. M. J. Yox
Mr. D. Woods
Ms. A. L. Pugh
Ms. K. M. Stacy
Mr. A. S. Parton
Mr. W. A. Sparkman
Mr. J. P. Redd
Mr. D. R. Culver
Mr. F. H. Willis
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cc:
Nuclear Regulatory Commission
Ms. C. Haney (w/o enclosures)
Mr. A. Bradford (w/o enclosures)
Ms. J. L. Dixon-Herrity (w/o enclosures)
Ms. J. M. Heisserer
Mr. C. J. Even
Mr. C. P. Patel
Mr. B. M. Bavol
Ms. R. C. Reyes
Ms. M. A. Sutton
Mr. M. E. Ernstes
Mr. G. J. Khouri
Mr. M. G. Kowal
Mr. J. D. Fuller
Mr. T. E. Chandler
Ms. S. E. Temple
Ms. P. Braxton
Mr. M. A. Junge
Mr. T. C. Brimfield
Mr. A. J. Lerch

Oglethorpe Power Corporation
Mr. M. W. Price
Ms. K. T. Haynes
Ms. A. Whaley

Municipal Electric Authority of Georgia
Mr. J. E. Fuller
Mr. S. M. Jackson

Dalton Utilities
Mr. D. Cope

WECTEC
Ms. K. Stoner (w/o enclosures)
Mr. C. A. Castell

Westinghouse Electric Company, LLC
Mr. R. Easterling (w/o enclosures)
Mr. J. W. Crenshaw (w/o enclosures)
Mr. L. Woodcock (w/o enclosures)
Mr. C. F. Landon
Mr. P. A. Russ
Mr. A. F. Dohse
Mr. M. Y. Shaqqo
Ms. S. DiTommaso

Other
Mr. J. E. Hesler, *Bechtel Power Corporation*
Ms. L. Matis, *Tetra Tech NUS, Inc.*
Dr. W. R. Jacobs, Jr., *Ph.D., GDS Associates, Inc.*
Mr. S. Roetger, *Georgia Public Service Commission*
Ms. S. W. Kernizan, *Georgia Public Service Commission*
Mr. K. C. Greene, *Troutman Sanders*
Mr. S. Blanton, *Balch Bingham*

Southern Nuclear Operating Company

ND-16-1851

Enclosure 1

Vogtle Electric Generating Plant (VEGP) Unit 3

Completion Plan for Uncompleted ITAAC Item 2.3.02.14 [Index No. 317]

Subject: Uncompleted ITAAC 2.3.02.14 [Index No. 317]

ITAAC Statement

Design Commitment

14. *The nonsafety-related piping located inside containment and designated as reactor coolant pressure boundary, as identified in Table 2.3.2-2, has been designed to withstand a seismic design basis event and maintain structural integrity.*

Inspections/Tests/Analyses

Inspection will be conducted of the as-built components as documented in the CVS Seismic Analysis Report.

Acceptance Criteria

The CVS Seismic Analysis Reports exist for the nonsafety related piping located inside containment and designated as reactor coolant pressure boundary as identified in Table 2.3.2-2.

ITAAC Completion Description

An inspection is conducted to verify that the nonsafety-related Chemical and Volume Control System (CVS) piping located inside containment and designated as reactor coolant pressure boundary, as identified in VEGP Unit 3 Combined License (COL) Appendix C Table 2.3.2-2 (Attachment A), has been designed to withstand a seismic design basis event and maintain structural integrity. The inspection confirms that a seismic analysis for the as-built components, i.e., piping, identified in Attachment A are documented in the VEGP Unit 3 CVS Seismic Analysis Report. Information associated with the VEGP Unit 3 CVS Seismic Analysis Report is discussed in VEGP 3&4 Updated Final Safety Analysis Report (UFSAR) Section 5.2.1.1, "Compliance with 10 CFR 50.55a", (Reference 1) and supplemented by UFSAR Section 5.2.1.3, "Alternate Classification", (Reference 2).

The design of the non-safety-related (American Society of Mechanical Engineers (ASME) B31.1 Piping Class D) CVS piping identified in Attachment A is summarized in the CVS Structural Integrity Piping Design Report XXX (Reference 3). Inspections are performed following installation of the piping identified in Attachment A to confirm that the as-built piping is installed per design report specifications. Inspection non-conformances are documented and dispositioned to ensure the nonsafety-related as-built CVS piping identified in Attachment A is designed and constructed to withstand a seismic design basis event and maintain structural integrity. CVS Seismic Analysis Report(s) (Reference 4) documents the seismic analysis for the as-built Attachment A piping using the criteria in Reference 1 and confirms that the nonsafety-related as-built CVS piping located inside containment and designated as reactor coolant

pressure boundary is designed to withstand a seismic design basis event and maintain structural integrity.

The CVS Seismic Analysis Report(s) for the CVS piping lines identified in Attachment A are available for NRC inspection as part of the ITAAC Completion Package (Reference 5).

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. VEGP 3&4 Updated Final Safety Analysis Report, Section 5.2.1.1, Compliance with 10 CFR 50.55a
2. VEGP 3&4 Updated Final Safety Analysis Report, Section 5.2.1.3, Alternate Classification
3. CVS Structural Integrity Piping Design Report XXX
4. CVS Seismic Analysis Reports identified in Attachment A
5. ITAAC 2.3.02.14 Completion Package
6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A: Excerpt from COL Appendix C Table 2.3.2-2

Line Name	Line Number	CVS Seismic Analysis Report
CVS Supply Line to Regenerative Heat Exchanger	L002	ZZZ
CVS Return Line from Regenerative Heat Exchanger	L018	ZZZ
CVS Line from Regenerative Heat Exchanger to Letdown Heat Exchanger	L003	ZZZ
CVS Lines from Letdown Heat Exchanger to Demin. Tanks	L004 L005 L072	ZZZ
CVS Lines from Demin Tanks to RC Filters and Connected Lines	L006(1) L007(1) L010(1) L011(1) L012 L015(1) L016(1) L020 L021 L022 L023(1) L024(1) L029 L037	ZZZ
CVS Lines from RC Filters to Regenerative Heat Exchanger	L030 L031 L034 L050 L073	ZZZ
CVS Resin Fill Lines to Demin. Tanks	L008(1) L013(1) L025(1)	ZZZ

Note:

1. Special seismic requirements include only the portion of piping normally exposed to RCS pressure. Piping beyond the first normally closed isolation valve is evaluated as seismic Category II piping extending to either an interface anchor, a rigid support following a six-way anchor, or the last seismic support of a rigidly supported region of the piping system as necessary to satisfy analysis requirements for piping connected to seismic Category I piping systems.