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Docket No.: 52-025

SEP 29 2016

ND-16-1885
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 3.3.00.02a.i.c [Index Number 762]

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 3.3.00.02a.i.c [Index Number 762] has not been completed greater than 225-days prior to initial fuel load. Enclosure 1 describes the plan for completing ITAAC 3.3.00.02a.i.c [Index Number 762]. 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

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MJY/KMS/amm

Enclosure:

1. Vogtle Electric Generating Plant (VEGP) Unit 3 Completion Plan for Uncompleted ITAAC
Item 3.3.00.02a.i.c [Index Number 762]

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Enclosure 1
Completion Plan

Southern Nuclear Operating Company

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Enclosure 1

Vogtle Electric Generating Plant (VEGP) Unit 3

**Completion Plan for Uncompleted ITAAC
Item 3.3.00.02a.i.c [Index No. 762]**

Subject: Uncompleted ITAAC 3.3.00.02a.i.c [Index No. 762]

ITAAC Statement

Design Commitment

2.a) *The nuclear island structures, including the critical sections listed in Table 3.3-7, are seismic Category I and are designed and constructed to withstand design basis loads as specified in the Design Description, without loss of structural integrity and the safety-related functions.*

Inspections/Tests/Analyses

i) *An inspection of the nuclear island structures will be performed. Deviations from the design due to as-built conditions will be analyzed for the design basis loads.*

Acceptance Criteria

i.c) *A report exists which reconciles deviations during construction and concludes that the as-built structures in the non-radiologically controlled area of the auxiliary building, including the critical sections, conform to the approved design and will withstand the design basis loads specified in the Design Description without loss of structural integrity or the safety-related functions.*

ITAAC Completion Description

Multiple ITAAC are performed to demonstrate that the nuclear island structures, including the critical sections listed in VEGP Unit 3 Combined License (COL) Appendix C Table 3.3-7 (Attachment A), are seismic Category I and are designed and constructed to withstand design basis loads as specified in the VEGP Unit 3 COL Appendix C Section 3.3 Design Description, without loss of structural integrity and the safety-related functions. The subject ITAAC verifies inspections of the as-built structures in the non-radiologically controlled area of the auxiliary building, including the critical sections, and reconciles deviations during construction to the approved design such that the as-built structures will withstand design basis loads without loss of structural integrity or the safety-related functions.

Design bases loads are defined in VEGP Unit 3 COL Appendix C Section 3.3 as those loads associated with:

- Normal plant operation (including dead loads, live loads, lateral earth pressure loads, and equipment loads, including hydrodynamic loads, temperature and equipment vibration);
- External events (including rain, snow, flood, tornado, tornado generated missiles and earthquake); and
- Internal events (including flood, pipe rupture, equipment failure, and equipment failure generated missiles).

VEGP 3&4 Updated Final Safety Analysis Report, Section 3.7 "Seismic Design", Section 3.8 "Design of Category I Structures", and Appendix 3H "Auxiliary and Shield Building Critical Sections" describe the analyses for the design basis loads for the NI Structures. Section 3.8

specifies the applicable codes and standards governing the design, materials, fabrication, construction inspection and testing for the NI structures. Section 3.8 also describes the as-built design summary reports which document that the seismic Category I structures meet the specified acceptance criteria.

The as-built structures in the non-radiologically controlled area of the auxiliary building, including the critical sections, listed in Attachment A, are constructed as designed and specified in the VEGP Unit 3 COL Appendix C Section 3.3 Design Description to withstand the Design Description design basis loads without loss of structural integrity and the safety-related functions.

The as-built structures in the non-radiologically controlled area of the auxiliary building, including the critical sections, listed in Attachment A are inspected during construction to verify the as-built structures conform to the specified design, codes and standards. Identified structural deviations are documented, evaluated, and reconciled by engineering to confirm the structures' ability to withstand design basis loads. The report identified in Reference 1 exists and documents the reconciliation of NI structural deviations identified during construction and conclude that the as-built structures in the non-radiologically controlled area of the auxiliary building, including the critical sections, will withstand the design basis loads specified in the Design Description without loss of structural integrity or the safety-related functions.

Reference 1 is available for NRC inspection as part of the ITAAC 3.3.00.02a.i.c Completion Package (Reference 2).

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 three closed (3) Non-Cited Violations and two closed (2) Violations associated with this ITAAC.

1. 05200025/2015-002-01 (Closed) – Failure to translate the design basis for the design of welded connections between structural steel plates and mechanical couplers, used for the attachment of concrete anchors to the plates, into specifications, drawings, procedures, and instructions.
 - a. The ITAAC completion review determined that all corrective actions associated with this finding are completed and closed. NRC closure of this finding is documented in NRC Inspection Report 05200025/2015-004
2. 05200025/2013-004-01 (Closed) – Failure to perform adequate inspections of safety-related embed plates at supplier facilities and failure to perform adequate examinations of these embed plates upon delivery, to assure the plates conformed to the procurement documents.
 - a. The ITAAC completion review determined that all corrective actions associated with this finding are completed and closed. NRC closure of this finding is documented in NRC Inspection Report 05200025/2014-008

3. 05200025/2013-003-01 (Closed) - Failure to ensure that anchorage of the headed shear reinforcement in the basemat and walls of the nuclear island, as detailed in the final design requirements, comply with the provisions of ACI 349-01, as required by the UFSAR.
 - a. The ITAAC completion review determined that all corrective actions associated with this finding are completed and closed. NRC closure of this finding is documented in NRC Inspection Report 05200025/2013-003.
4. 05200025/2012-008-01 (Closed) – Failure to assure design services were accomplished with the appropriate design control measures.
 - a. The ITAAC completion review determined that all corrective actions associated with this finding are completed and closed. NRC closure of this finding is documented in NRC Inspection Report 05200025/2012-004
5. 05200025/2012-004-02 (Closed) – As-built submodule CA20-04, auxiliary building embed plates, and nuclear island reinforcement steel not in accordance with procurement documents.
 - a. The ITAAC completion review determined that all corrective actions associated with this finding are completed and closed. NRC closure of this finding is documented in NRC Inspection Report 05200025/2013-005

Before submission of the ICN, corrective actions will be completed for all relevant ITAAC findings identified prior to ICN submission.

References (available for NRC inspection)

1. As-Built Summary Report for Aux Non-RCA EL 66'-6"- EL 100'-0"/Aux Non-RCA EL 100'-0" – Roof / Aux RCA (DDD-EE-FFF-###)
2. ITAAC 3.3 00.02a.i.c Completion Package
3. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A: Excerpt of COL Appendix C Table 3.3-7

Auxiliary Building

Interior wall of auxiliary building (column line 7.3), elevation 66'-6" to elevation 160'-6"

West wall of main control room in auxiliary building (column line L), elevation 117'-6" to elevation 153'-0"

North wall of MSIV east compartment (column line 11 between lines L and M), elevation 117'-6" to elevation 153'-0"

Floor slab on metal decking at elevation 135'-3"

2'-0" slab in auxiliary building (tagging room ceiling) at elevation 135'-3"

Finned floor in the main control room at elevation 135'-3"

Nuclear Island Basemat Below Auxiliary Building

Bay between reference column lines 9.1 and 11, and K and L

Nuclear Island Critical Structural Sections