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A SOUTHERN COMPANY

Docket No.: 52-025

SEP 29 2016

ND-16-1883
10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission
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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.a [Index Number 760]

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.a [Index Number 760] 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.a [Index Number 760]. 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

U.S. Nuclear Regulatory Commission

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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.a [Index Number 760]

To:

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ND-16-1883
Enclosure 1
Completion Plan

Southern Nuclear Operating Company

ND-16-1883

Enclosure 1

Vogtle Electric Generating Plant (VEGP) Unit 3

**Completion Plan for Uncompleted ITAAC
Item 3.3.00.02a.i.a [Index No. 760]**

Subject: Uncompleted ITAAC 3.3.00.02a.i.a [Index No. 760]

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.a) A report exists which reconciles deviations during construction and concludes that the as-built containment internal structures, 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 inspection of the as-built containment internal structures, 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 Nuclear Island (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 containment internal structures, 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 containment internal structures, 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 reports identified in References 1 and 2 exist and document the reconciliation of NI structural deviations identified during construction and conclude that the as-built containment internal structures, 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.

References 1 and 2 are available for NRC inspection as part of the ITAAC 3.3.00.02a.i.a Completion Package (Reference 3).

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 four closed (4) Non-Cited Violations and one closed (1) Violation 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. 05200025/2014-005-01 (Closed) – Failure to assure that special processes (including welding) were controlled and accomplished using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements.
 - 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
3. 05200025/2012-004-01 (Closed) – Failure to assure that applicable regulatory requirements and the design basis for safety-related systems, structures, and components were correctly translated into specifications, drawings, 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 05200025/2013-004
4. 05200025/2014-004-01 (Closed) – Failure to correctly translate shear reinforcement design requirements into design drawings.

- 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 05200025/2014-004
5. 05200025/2014-004-02 (Closed) – Failure to install structural reinforcement in accordance with ACI 349-01 development length requirements.
 - 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 05200025/2014-004

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 CIS RC items / CIS Structural Steel (BBB-CC-DDD-###)
2. As-Built Summary Report for CIS Modules (CCC-DD-EEE-###)
3. ITAAC 3.3.00.02a.i.a Completion Package
4. 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

Containment Internal Structures

South west wall of the refueling cavity
South wall of the west steam generator compartment
North east wall of the in-containment refueling water storage tank
In-containment refueling water storage tank steel wall
Column supporting the operating floor

Nuclear Island Critical Structural Sections