

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



Docket No.: 52-025

**SEP 29 2016**

ND-16-1850  
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 2.2.04.09b.i [Index Number 242]

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 2.2.04.09b.i [Index Number 242] has not been completed greater than 225-days prior to initial fuel load. Enclosure 1 describes the plan for completing ITAAC 2.2.04.09b.i [Index Number 242]. 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

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**Enclosure:**

1. Vogtle Electric Generating Plant (VEGP) Unit 3 Completion Plan for Uncompleted ITAAC  
Item 2.2.04.09b.i [Index Number 242]

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**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)

Ms. 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. Bovol

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

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**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*

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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 2.2.04.09b.i [Index No. 242]**

**Subject: Uncompleted ITAAC 2.2.04.09b.i [Index No. 242]**

### **ITAAC Statement**

#### **Design Commitment**

*9.b) During shutdown operations, the SGS removes decay heat by delivery of startup feedwater to the steam generator and venting of steam from the steam generators to the atmosphere.*

#### **Inspections/Tests/Analyses**

*i) Tests will be performed to demonstrate the ability of the startup feedwater system to provide feedwater to the steam generators.*

#### **Acceptance Criteria**

*i) See ITAAC Table 2.4.1-2, Item 2.*

### **ITAAC Completion Description**

This ITAAC's design commitment is met by reference to ITAAC Item 2 in VEGP Unit 3 Combined License (COL) Appendix C, Table 2.4.1-2. Item 2 verifies that each Feedwater System (FWS) startup feedwater pump provides a flow rate greater than or equal to 260 gpm to each steam generator system at a steam generator secondary side pressure of at least 1106 psia.

The ITAAC Closure Notification (Reference 1) summarizes the methodology for conducting the Inspections/Tests/Analyses, and the results that demonstrate that the acceptance criteria are met. This closure notification is submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination bases are referenced in the closure notification for item 2 from VEGP Unit 3 COL Appendix C Table 2.4.1-2 and are available for NRC inspection as part of the ITAAC 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 there are no relevant ITAAC findings associated with this ITAAC.

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Enclosure 1  
Completion Plan

**References (available for NRC inspection)**

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.4.01.02 [Index No. 493]
2. ITAAC 2.2.04.09b.i Completion Package
3. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"