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Docket No.: 52-025

**SEP 29 2016**

ND-16-1845  
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 2.2.03.08c.iv.04 [Index Number 186]

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 2.2.03.08c.iv.04 [Index Number 186] has not been completed greater than 225-days prior to initial fuel load. Enclosure 1 describes the plan for completing ITAAC 2.2.03.08c.iv.04 [Index Number 186]. 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,

A handwritten signature in black ink, appearing to read "Michael J. Yox", is written over a light gray circular background.

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 2.2.03.08c.iv.04 [Index Number 186]

**To:**

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ND-16-1845  
Enclosure 1  
Completion Plan

**Southern Nuclear Operating Company**

**ND-16-1845**

**Enclosure 1**

**Vogtle Electric Generating Plant (VEGP) Unit 3**

**Completion Plan for Uncompleted ITAAC  
Item 2.2.03.08c.iv.04 [Index No. 186]**

**Subject: Uncompleted ITAAC 2.2.03.08c.iv.04 [Index No. 186]**

### **ITAAC Statement**

#### **Design Commitment**

- 8.c) *The PXS provides RCS makeup, boration, and safety injection during design basis events.*

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

- iv) *Inspections of the elevation of the following pipe lines will be conducted:*

*4. PRHR HX outlet line to SG connection*

#### **Acceptance Criteria**

- iv) *The maximum elevation of the top inside surface of these lines is less than the elevation of:*

*4. PRHR HX lower channel head top inside surface*

### **ITAAC Completion Description**

Multiple ITAAC are performed to demonstrate that the Passive Core Cooling System (PXS) provides Reactor Coolant System (RCS) makeup, boration, and safety injection during design basis events. This ITAAC requires that inspections be conducted to verify that the maximum elevation of the top inside surface of the Passive Residual Heat Removal Heat Exchanger (PRHR HX) outlet line to Steam Generator (SG) connection is less than the elevation of the PRHR HX lower channel head top inside surface.

The inspection of the PRHR HX outlet line to SG connection top inside surface and the PRHR HX lower channel head top inside surface is performed using survey equipment in accordance with site survey and measurement procedures. The maximum measured elevation of the PRHR HX outlet line to SG connection top inside surface is compared to the measured elevation of the PRHR HX lower channel head top inside surface using a common reference point.

The inspection results are documented in the Principal Closure Document XXX (Reference 1) supporting the ITAAC 2.2.03.08c.iv.04 Completion Package (Reference 2) and determined that the maximum elevation of the PRHR HX outlet line to SG connection top inside surface is xxx feet and the elevation of the PRHR HX lower channel head top inside surface is yyy feet. The inspection results verify that the maximum elevation of the PRHR HX outlet line to SG connection top inside surface is less than the elevation of the PRHR HX lower channel head top inside surface.

Principal Closure Document XXX exists and is available for NRC inspection as part of the ITAAC 2.2.03.08c.iv.04 Completion Package.

### **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. Principal Closure Document XXX
2. ITAAC 2.2.03.08c.iv.04 Completion Package
3. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"