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A SOUTHERN COMPANY

Docket No.: 52-025

**SEP 29 2016**

ND-16-1843  
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.02 [Index Number 184]

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.02 [Index Number 184] 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.02 [Index Number 184]. 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

U.S. Nuclear Regulatory Commission

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**Enclosure:**

1. Vogtle Electric Generating Plant (VEGP) Unit 3 Completion Plan for Uncompleted ITAAC  
Item 2.2.03.08c.iv.02 [Index Number 184]

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ND-16-1843  
Enclosure 1  
Completion Plan

**Southern Nuclear Operating Company**

**ND-16-1843**

**Enclosure 1**

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

**Completion Plan for Uncompleted ITAAC  
Item 2.2.03.08c.iv.02 [Index No. 184]**

**Subject: Uncompleted ITAAC 2.2.03.08c.iv.02 [Index No. 184]**

## **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:*

*2. Containment recirculation lines; containment to IRWST lines*

### **Acceptance Criteria**

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

*2. IRWST bottom 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 containment recirculation lines and the containment to In-containment Refueling Water Storage Tank (IRWST) lines is less than the elevation of IRWST bottom inside surface.

The inspection of the containment recirculation lines top inside surface, containment to IRWST lines top inside surface, and the IRWST bottom inside surface elevations is performed using survey equipment in accordance with site survey and measurement procedures. The maximum measured elevation of the containment recirculation lines top inside surface and containment to IRWST lines top inside surface is compared to the measured elevation of the IRWST bottom 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.02 Completion Package (Reference 2) and determined that the maximum elevation of the top inside surface of the containment recirculation lines and containment to IRWST lines is xxx feet and the elevation of IRWST bottom inside surface is yyy feet. The inspection results verify that the maximum elevation of the top inside surface of the

containment recirculation lines and containment to IRWST lines is less than the elevation of IRWST bottom inside surface.

Principal Closure Document XXX exists and is available for NRC inspection as part of the ITAAC 2.2.03.08c.iv.02 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.02 Completion Package
3. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"