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Docket No.: 52-025

**SEP 30 2016**

ND-16-1873  
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 3.2.00.01e [Index Number 744]

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 3.2.00.01e [Index Number 744] has not been completed greater than 225-days prior to initial fuel load. Enclosure 1 describes the plan for completing ITAAC 3.2.00.01e [Index Number 744]. 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 3.2.00.01e [Index Number 744]

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Enclosure 1  
Completion Plan

**Southern Nuclear Operating Company**

**ND-16-1873**

**Enclosure 1**

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

**Completion Plan for Uncompleted ITAAC  
Item 3.2.00.01e [Index No. 744]**

**Subject: Uncompleted ITAAC 3.2.00.01e [Index No. 744]**

**ITAAC Statement**

Design Commitment

1. *The HFE verification and validation program is performed in accordance with the HFE verification and validation implementation plan and includes the following activities:*
  - e) *Plant HFE/HSI (as designed at the time of plant startup) verification*

Inspections/Tests/Analyses

- e) *An evaluation of the implementation of the plant HFE/HSI (as designed at the time of plant startup) verification will be performed.*

Acceptance Criteria

- e) *A report exists and concludes that: The plant HFE/HSI, as designed at the time of plant startup, is consistent with the HFE/HSI verified in 1.a) through 1.d).*

**ITAAC Completion Description**

Multiple ITAAC are performed to verify that the Human Factors Engineering (HFE) verification and validation program, as described in VEGP 3&4 Updated Final Safety Analysis Report, Section 18.11, Human Factors Engineering Verification and Validation (Reference 1), is performed in accordance with the HFE verification and validation implementation plan. The subject ITAAC requires that an evaluation of the implementation of the plant HFE/Human-System Interface (HFE/HSI) (as designed at the time of plant startup) verification be performed which concludes that the plant HFE/HSI, as designed at the time of plant startup, is consistent with the HFE/HSI verified in 1.a) through 1.d) (ITAAC 3.2.00.01a through 3.2.00.01d, References 2-6).

An evaluation is performed in accordance with the AP1000 Plant Startup Human Factors Engineering Design Verification Plan (Reference 7), to demonstrate that the plant HFE/HSI design at the time of plant startup conforms to the human factors principles and guidance as specified in APP-OCS-GBH-001 "AP1000 Human Factors Engineering Program Plan" (Reference 8). The results of the evaluation are documented in the AP1000 Plant Startup Human Factors Engineering Design Verification Report (Reference 9).

The AP1000 Plant Startup Human Factors Engineering Design Verification Report exists and concludes that the plant HFE/HSI, as designed at the time of plant startup, is consistent with the HFE/HSI verified in in 1.a) through 1.d), (ITAAC 3.2.00.01a through 3.2.00.01d). This report is available for NRC inspection as part of the ITAAC Completion Package (Reference 10).

**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. VEGP 3&4 Updated Final Safety Analysis Report, Section 18.11, Human Factors Engineering Verification and Validation
2. ITAAC 3.2.00.01a ITAAC Closure Letter
3. ITAAC 3.2.00.01b ITAAC Closure Letter
4. ITAAC 3.2.00.01c.i ITAAC Closure Letter
5. ITAAC 3.2.00.01c.ii ITAAC Closure Letter
6. ITAAC 3.2.00.01d ITAAC Closure Letter
7. APP-OCS-GEH-520, AP1000 Plant Startup Human Factors Engineering Design Verification Plan
8. APP-OCS-GBH-001 AP1000 Human Factors Engineering Program Plan
9. APP-OCS-GER-520, AP1000 Plant Startup Human Factors Engineering Design Verification Report
10. ITAAC 3.2.00.01e Completion Package
11. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"