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Docket No.: 52-025

**SEP 30 2016**

ND-16-1862  
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 2.6.03.09 [Index Number 618]

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 2.6.03.09 [Index Number 618] has not been completed greater than 225-days prior to initial fuel load. Enclosure 1 describes the plan for completing ITAAC 2.6.03.09 [Index Number 618]. 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 2.6.03.09 [Index Number 618]

**To:**

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ND-16-1862  
Enclosure 1  
Completion Plan

**Southern Nuclear Operating Company**

**ND-16-1862**

**Enclosure 1**

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

**Completion Plan for Uncompleted ITAAC  
Item 2.6.03.09 [Index No. 618]**

**Subject: Uncompleted ITAAC 2.6.03.09 [Index No. 618]**

## **ITAAC Statement**

### **Design Commitment**

9. *The IDS batteries, battery chargers, dc distribution panels, and MCCs are rated to withstand fault currents for the time required to clear the fault from its power source.*

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

*Analyses for the as-built IDS dc electrical distribution system to determine fault currents will be performed.*

### **Acceptance Criteria**

*Analyses for the as-built IDS dc electrical distribution system exist and conclude that the fault current capacities of as-built IDS batteries, battery chargers, dc distribution panels, and MCCs, as determined by manufacturer's ratings, exceed their analyzed fault currents for the time required to clear the fault from its power source as determined by the circuit interrupting device coordination analyses.*

## **ITAAC Completion Description**

Analyses for the as-built Class 1E dc and Uninterruptible Power Supply System (IDS) dc electrical distribution system are performed to verify that the fault current capacities of as-built IDS batteries, battery chargers, dc distribution panels, and Motor Control Centers (MCCs), as determined by manufacturer's ratings, exceed their analyzed fault currents for the time required to clear the fault from its power source as determined by the circuit interrupting device coordination analyses. Fault current and circuit interrupting device coordination analysis requirements for the IDS dc electrical distribution system are described in VEGP 3&4 Updated Final Safety Analysis Report, Section 8.3.2.2, "Analysis" (Reference 1).

The worst case short circuit (fault) currents of the as-built IDS batteries, battery chargers, dc distribution panels, and MCCs are determined by calculation and are summarized in the IDS Short Circuit Analysis (Reference 2). The results of Reference 2 are used in combination with the circuit interrupting device IDS Protection Coordination Study (Reference 3) to determine the worst case analyzed fault currents for the time required to clear the fault from its power source.

The manufacturer's fault current ratings of the as-built IDS batteries, battery chargers, dc distribution panels, and MCCs are inspected in accordance with QSI 10.1-V, "Inspection Planning and Reporting" (Reference 4). The fault current ratings for each of the batteries, battery chargers, dc distribution panels, and MCCs, as documented in inspection records, are then compared to the fault current information determined in References 2 and 3 to verify that the fault current capacities of as-built IDS batteries, battery chargers, dc distribution panels, and

MCCs, as determined by manufacturer's ratings, exceed their analyzed fault currents for the time required to clear the fault from its power source.

The results of these comparison analyses are documented in the Principal Closure Document XXX (Reference 5) supporting the ITAAC 2.6.03.09 Completion Package (Reference 6) and conclude that the fault current capacities of as-built IDS batteries, battery chargers, dc distribution panels, and MCCs, as determined by manufacturer's ratings, exceed their analyzed fault currents for the time required to clear the fault from its power source as determined by the circuit interrupting device coordination analyses.

Principal Closure Document XXX exists and is available for NRC inspection as part of the ITAAC 2.6.03.09 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. VEGP 3&4 Updated Final Safety Analysis Report, Section 8.3.2.2, Analysis
2. IDS Short Circuit Analysis
3. IDS Protection Coordination Study
4. QSI 10.1-V, Inspection Planning and Reporting
5. Principal Closure Document XXX
6. ITAAC 2.6.03.09 Completion Package
7. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"