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 3 0 2016

ND-16-1841 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 2.2.02.08c [Index Number 149]

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 2.2.02.08c [Index Number 149] has not been completed greater than 225-days prior to initial fuel load. Enclosure 1 describes the plan for completing ITAAC 2.2.02.08c [Index Number 149]. 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:

 Vogtle Electric Generating Plant (VEGP) Unit 3 Completion Plan for Uncompleted ITAAC Item 2.2.02.08c [Index Number 149] U.S. Nuclear Regulatory Commission

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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. Bavol

Ms. R. C. Reyes

Ms. M. A. Sutton

Mr. M. E. Ernstes Mr. G. J. Khouri

Mr. M. G. Kowal

ivii. ivi. G. Kowe

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

Southern Nuclear Operating Company

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Enclosure 1

Vogtle Electric Generating Plant (VEGP) Unit 3

Completion Plan for Uncompleted ITAAC Item 2.2.02.08c [Index No. 149]

Subject: Uncompleted ITAAC 2.2.02.08c [Index No. 149]

ITAAC Statement

Design Commitment

8.c) The PCCWST includes a water inventory for the fire protection system.

Inspections/Tests/Analyses

See ITAAC Table 2.3.4-2, items 1 and 2.

Acceptance Criteria

See ITAAC Table 2.3.4-2, items 1 and 2.

ITAAC Completion Description

This ITAAC's design commitment is met by reference to ITAAC Items 1, 2.i, and 2.ii in VEGP Unit 3 Combined License (COL) Appendix C, Table 2.3.4-2. Item 1 verifies that the Fire Protection System (FPS) conforms with the functional arrangement as described in the Design Description in VEGP Unit 3 COL Appendix C Section 2.3.4. Item 2.i verifies that the piping identified in VEGP Unit 3 COL Appendix C Table 2.3.4-4 is located on the Nuclear Island. Item 2.ii verifies that the as-built piping stress report exists and concludes that the FPS piping remains functional following a safe shutdown earthquake.

The ITAAC Closure Notifications (References 1 2, and 3) summarize the methodology for conducting the Inspections/Tests/Analyses, and the results that demonstrate that the acceptance criteria are met. These closure notifications are 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 notifications for items 1, 2.i, and 2.ii from VEGP Unit 3 COL Appendix C Table 2.3.4-2 and are available for NRC inspection as part of the ITAAC Completion Package (Reference 4).

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. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.3.04.01 [Index No. 326]
- 2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.3.04.02.i [Index No. 327]
- 3. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.3.04.02.ii [Index No. 328]
- 4. ITAAC 2.2.02.08c Completion Package
- 5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"