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Docket No.: 52-025

**OCT 20 2016**

ND-16-1976  
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 2.1.02.08d.viii [Index Number 39]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of October 14, 2016, Vogtle Electric Generating Plant (VEGP) Unit 3 Uncompleted Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) Item 2.1.02.08d.viii [Index Number 39] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.1.02.08d.viii [Index Number 39]. 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

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Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion Plan for Uncompleted ITAAC 2.1.02.08d.viii [Index Number 39]

MJY/kms/amm

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**Southern Nuclear Operating Company  
ND-16-1976  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion Plan for Uncompleted ITAAC 2.1.02.08d.viii [Index Number 39]**

**Subject: Uncompleted ITAAC 2.1.02.08d.viii [Index No. 39]**

**ITAAC Statement**

Design Commitment

*8.d) The RCS provides automatic depressurization during design basis events.*

Inspections/Tests/Analyses

*viii) Inspection of the elevation of each ADS sparger will be conducted.*

Acceptance Criteria

*viii) The centerline of the connection of the sparger arms to the sparger hub is  $\leq$  11.5 feet below the IRWST overflow level.*

**ITAAC Completion Description**

Multiple ITAAC are performed to demonstrate that the Reactor Coolant System (RCS) provides automatic depressurization during design basis events. This ITAAC requires that an inspection be conducted of the Automatic Depressurization System (ADS) spargers (Sparger A and Sparger B) to verify that the centerline of the connection of the sparger arms to the sparger hub is  $\leq$  11.5 feet below the In-containment Refueling Water Storage Tank (IRWST) overflow level.

The inspection of the centerline of the connection of the sparger arms to the sparger hub and the IRWST overflow level is performed using survey equipment in accordance with site survey and measurement procedures. The measured elevation of the centerline of the connection of the sparger arms to the sparger hub for each sparger is compared to the measured elevation of the IRWST overflow level using a common reference point.

The inspection results are documented in the Principal Closure Document XXX (Reference 1) supporting the ITAAC 2.1.02.08d.viii Completion Package (Reference 2) and determined that the elevation of the centerline of the connection of the sparger arms to the sparger hub for Sparger A is xxx.x feet and yyy.y feet for Sparger B, and the elevation of the IRWST overflow is zzz.z feet. The inspection results verify that the centerline of the connection of the sparger arms to the sparger hub is xx.x ft below the elevation of the IRWST overflow. This meets the ITAAC acceptance criteria of  $\leq$  11.5 feet.

Principal Closure Document XXX is available for NRC inspection as part of the ITAAC 2.1.02.08d.viii 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 2.1.02.08d.viii Completion Package
3. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"