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

OCT 2 0 2016

ND-16-1988 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 2.3.06.09b.iii [Index Number 376]

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 2.3.06.09b.iii [Index Number 376] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.3.06.09b.iii [Index Number 376]. 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 2.3.06.09b.iii [Index Number 376]

MJY/kms/amm

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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. J. D. Fuller
- Mr. T. E. Chandler
- Ms. S. E. Temple
- Ms. P. Braxton
- Mr. T. C. Brimfield
- Mr. A. J. Lerch

Oglethorpe Power Corporation

- Mr. M. W. Price
- Ms. K. T. Haynes
- Ms. A. Whaley

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Municipal Electric Authority of Georgia

Mr. J. E. Fuller Mr. S. M. Jackson

Dalton Utilities

Mr. D. Cope

WECTEC

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. 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

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Southern Nuclear Operating Company ND-16-1988 Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3
Completion Plan for Uncompleted ITAAC 2.3.06.09b.iii [Index Number 376]

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Subject: Uncompleted ITAAC 2.3.06.09b.iii [Index No. 376]

ITAAC Statement

Design Commitment

9.b) The RNS provides heat removal from the reactor coolant during shutdown operations.

Inspections/Tests/Analyses

iii) Inspection will be performed of the reactor coolant loop piping.

Acceptance Criteria

iii) The RCS cold legs piping centerline is 17.5 inches ± 2 inches above the hot legs piping centerline.

ITAAC Completion Description

Multiple ITAAC are performed to demonstrate that the Normal Residual Heat Removal System (RNS) provides heat removal from the reactor coolant during shutdown operations. This ITAAC requires an inspection of the elevation difference in hot leg and cold leg reactor coolant loop piping to verify that the RCS cold legs piping centerline is 17.5 inches ± 2 inches above the hot legs piping centerline.

The inspection of the reactor coolant loop piping is performed by survey personnel utilizing survey equipment in accordance with site survey and measurement procedures. The elevation difference is determined by measuring the centerline elevation of each piping leg (2 hot legs, 4 cold legs) at multiple locations in relation to a common reference point, and comparing the results.

The inspection results are documented in the Principal Closure Document XXX (Reference 1) supporting the ITAAC 2.3.06.09b.iii Completion Package (Reference 2) and determined that the RCS cold legs piping centerline above the RCS hot legs piping centerline ranged from minimum of xx.x inches to a maximum yy.y inches. The inspection results confirm that the RCS cold legs piping centerline is 17.5 inches ± 2 inches above the hot legs piping centerline.

Principal Closure Document XXX is available for NRC inspection as part of the ITAAC2.3.06.09b.iii 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.

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References (available for NRC inspection)

- 1. Principal Closure Document XXX
- 2. ITAAC 2.3.06.09b.iii Completion Package
- 3. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"