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Docket No.: 52-025

OCT 2 4 2016

ND-16-2129 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 2.1.02.05a.iii [Index Number 21]

#### 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 2.1.02.05a.iii [Index Number 21] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.1.02.05a.iii [Index Number 21]. 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 2.1.02.05a.iii [Index Number 21]

MJY/kms/amm

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## Southern Nuclear Operating Company ND-16-2129 Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3
Completion Plan for Uncompleted ITAAC 2.1.02.05a.iii [Index Number 21]

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Subject: Uncompleted ITAAC 2.1.02.05a.iii [Index No. 21]

## **ITAAC Statement**

#### **Design Commitment**

5.a) The seismic Category I equipment identified in Table 2.1.2-1 can withstand seismic design basis loads without loss of safety function.

#### Inspections/Tests/Analyses

iii) Inspection will be performed for the existence of a report verifying that the as-built equipment including anchorage is seismically bounded by the tested or analyzed conditions.

## Acceptance Criteria

iii) A report exists and concludes that the as-built equipment including anchorage is seismically bounded by the tested or analyzed conditions.

#### **ITAAC Completion Description**

Multiple ITAAC are performed to demonstrate that the seismic Category I equipment identified in VEGP Unit 3 Combined License (COL) Appendix C Table 2.1.2-1 (Attachment A) can withstand seismic design basis loads without loss of safety function. The subject ITAAC requires that an inspection is performed for the existence of a report verifying that the as-built equipment including anchorage are seismically bounded by the tested or analyzed conditions.

Seismic qualification of the equipment in VEGP Unit 3 COL Appendix C Table 2.1.2-1 is verified by type tests, analyses, or a combination of type tests and analyses in accordance with ITAAC 2.1.02.05a.ii (Reference 1). As part of the seismic qualification program, consideration is given to the definition of clearances needed around the equipment mounted in the plant to permit the equipment to move during a postulated seismic event without causing impact between adjacent pieces of safety-related equipment or between safety-related equipment and adjacent non-safety related structures or components. This is done as part of seismic testing by measuring the maximum dynamic relative displacement of the top and bottom of the equipment. Justification is provided that the equipment will not impact adjacent equipment or structures as part of the Equipment Qualification (EQ) As-Built Reconciliation Report (Reference 2) based on the walkdown inspection.

The qualification reports of the equipment identify the equipment mounting employed for qualification and establish interface requirements for assuring that subsequent in-plant installation does not degrade the established qualification. Interface requirements are defined based on the test configuration and other design requirements.

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In accordance with EQ Walkdown Inspection Procedure XYZ (Reference 3), an inspection is conducted of the Reactor Coolant System (RCS) to confirm the satisfactory installation of the seismically qualified equipment. The inspection includes verification of equipment make/model/serial number; verification of as-built equipment mounting orientation, anchorage and clearances; and verification of electrical and other interfaces.

The documentation of installed configuration of seismically qualified equipment includes photographs and/or sketches of equipment/mounting/interfaces. The verification of installed equipment configuration is documented in the EQ As-Built Reconciliation Report(s).

Attachment A identifies the EQ As-Built Reconciliation Report(s) which verify that the installed configuration of the Seismic Category I equipment identified in VEGP Unit 3 COL Appendix C Table 2.1.2-1, including anchorage, is seismically bounded by the tested or analyzed conditions and IEEE Standard 344-1987 (Reference 4) and NRC Regulatory Guide 1.100, Rev. 2 (Reference 5). The EQ As-Built Reconciliation Report(s) are available for NRC inspection as part of the ITAAC Completion Package (Reference 6).

#### **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)

- ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.1.02.05a.ii [Index No. 20]
- 2. EQ As-Built Reconciliation Report(s) as identified in Attachment A
- 3. EQ Walkdown Inspection Procedure XYZ
- 4. IEEE Standard 344-1987, "Recommended Practices for Seismic Qualification of Class 1E Equipment for Nuclear Power Generating Stations"
- 5. Regulatory Guide 1.100, Rev. 2, "Seismic Qualification of Electric and Mechanical Equipment for Nuclear Power Plants"
- 6. ITAAC 2.1.02.05a.iii Completion Package
- 7. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

## Attachment A: Excerpt from COL Appendix C Table 2.1.2-1

# ITAAC COMPLIANCE MATRIX FOR SEISMIC CATEGORY I EQUIPMENT (REACTOR COOLANT SYSTEM)

Equipment Name	Tag No.	Seismic Cat. I	EQ As-Built Reconciliation Report(s)
Steam Generator 1	RCS-MB-01	Yes	XXX
Steam Generator 2	RCS-MB-02	Yes	XXX
RCP 1A	RCS-MP-01A	Yes	XXX
RCP 1B	RCS-MP-01B	Yes	XXX
RCP 2A	RCS-MP-02A	Yes	XXX
RCP 2B	RCS-MP-02B	Yes	XXX
Pressurizer	RCS-MV-02	Yes	XXX
Automatic Depressurization System (ADS) Sparger A	PXS-MW-01A	Yes	xxx
ADS Sparger B	PXS-MW-01B	Yes	XXX
Pressurizer Safety Valve	RCS-PL-V005A	Yes	XXX
Pressurizer Safety Valve	RCS-PL-V005B	Yes	XXX
First-stage ADS Motor-operated Valve (MOV)	RCS-PL-V001A	Yes	XXX
First-stage ADS MOV	RCS-PL-V001B	Yes	XXX
Second-stage ADS MOV	RCS-PL-V002A	Yes	XXX
Second-stage ADS MOV	RCS-PL-V002B	Yes	XXX
Third-stage ADS MOV	RCS-PL-V003A	Yes	XXX
Third-stage ADS MOV	RCS-PL-V003B	Yes	XXX
Fourth-stage ADS Squib Valve	RCS-PL-V004A	Yes	XXX
Fourth-stage ADS Squib Valve	RCS-PL-V004B	Yes	XXX
Fourth-stage ADS Squib Valve	RCS-PL-V004C	Yes	XXX
Fourth-stage ADS Squib Valve	RCS-PL-V004D	Yes	XXX
ADS Discharge Header A Vacuum Relief Valve	RCS-PL-V010A	Yes	xxx
ADS Discharge Header B Vacuum Relief Valve	RCS-PL-V010B	Yes	xxx
First-stage ADS Isolation MOV	RCS-PL-V011A	Yes	XXX
First-stage ADS Isolation MOV	RCS-PL-V011B	Yes	XXX
Second-stage ADS Isolation MOV	RCS-PL-V012A	Yes	xxx
Second-stage ADS Isolation MOV	RCS-PL-V012B	Yes	xxx
Third-stage ADS Isolation MOV	RCS-PL-V013A	Yes	XXX
Third-stage ADS Isolation MOV	RCS-PL-V013B	Yes	XXX
Fourth-stage ADS MOV	RCS-PL-V014A	Yes	XXX
Fourth-stage ADS MOV	RCS-PL-V014B	Yes	XXX
Fourth-stage ADS MOV	RCS-PL-V014C	Yes	XXX
Fourth-stage ADS MOV	RCS-PL-V014D	Yes	XXX
Reactor Vessel Head Vent Valve	RCS-PL-V150A	Yes	XXX
Reactor Vessel Head Vent Valve	RCS-PL-V150B	Yes	XXX

Equipment Name	Tag No.	Seismic	EQ As-Built
		Cat. I	Reconciliation Report(s)
Reactor Vessel Head Vent Valve	RCS-PL-V150C	Yes	XXX
Reactor Vessel Head Vent Valve	RCS-PL-V150D	Yes	XXX
RCS Hot Leg 1 Flow Sensor	RCS-101A	Yes	XXX
RCS Hot Leg 1 Flow Sensor	RCS-101B	Yes	XXX
RCS Hot Leg 1 Flow Sensor	RCS-101C	Yes	XXX
RCS Hot Leg 1 Flow Sensor	RCS-101D	Yes	XXX
RCS Hot Leg 2 Flow Sensor	RCS-102A	Yes	XXX
RCS Hot Leg 2 Flow Sensor	RCS-102B	Yes	XXX
RCS Hot Leg 2 Flow Sensor	RCS-102C	Yes	XXX
RCS Hot Leg 2 Flow Sensor	RCS-102D	Yes	XXX
RCS Cold Leg 1A Narrow Range Temperature Sensor	RCS-121A	Yes	xxx
RCS Cold Leg 1B Narrow Range Temperature Sensor	RCS-121B	Yes	xxx
RCS Cold Leg 1B Narrow Range Temperature Sensor	RCS-121C	Yes	xxx
RCS Cold Leg 1A Narrow Range Temperature Sensor	RCS-121D	Yes	xxx
RCS Cold Leg 2B Narrow Range Temperature Sensor	RCS-122A	Yes	xxx
RCS Cold Leg 2A Narrow Range Temperature Sensor	RCS-122B	Yes	xxx
RCS Cold Leg 2A Narrow Range Temperature Sensor	RCS-122C	Yes	xxx
RCS Cold Leg 2B Narrow Range Temperature Sensor	RCS-122D	Yes	xxx
RCS Cold Leg 1A Dual Range Temperature Sensor	RCS-125A	Yes	xxx
RCS Cold Leg 2A Dual Range Temperature Sensor	RCS-125B	Yes	xxx
RCS Cold Leg 1B Dual Range Temperature Sensor	RCS-125C	Yes	xxx
RCS Cold Leg 2B Dual Range Temperature Sensor	RCS-125D	Yes	xxx
RCS Hot Leg 1 Narrow Range Temperature Sensor	RCS-131A	Yes	xxx
RCS Hot Leg 2 Narrow Range Temperature Sensor	RCS-131B	Yes	xxx
RCS Hot Leg 1 Narrow Range Temperature Sensor	RCS-131C	Yes	XXX
RCS Hot Leg 2 Narrow Range Temperature Sensor	RCS-131D	Yes	xxx
RCS Hot Leg 1 Narrow Range Temperature Sensor	RCS-132A	Yes	xxx
RCS Hot Leg 2 Narrow Range Temperature Sensor	RCS-132B	Yes	xxx

Equipment Name	Tag No.	Seismic Cat. I	EQ As-Built Reconciliation Report(s)
RCS Hot Leg 1 Narrow Range Temperature Sensor	RCS-132C	Yes	xxx
RCS Hot Leg 2 Narrow Range Temperature Sensor	RCS-132D	Yes	XXX
RCS Hot Leg 1 Narrow Range Temperature Sensor	RCS-133A	Yes	xxx
RCS Hot Leg 2 Narrow Range Temperature Sensor	RCS-133B	Yes	xxx
RCS Hot Leg 1 Narrow Range Temperature Sensor	RCS-133C	Yes	xxx
RCS Hot Leg 2 Narrow Range Temperature Sensor	RCS-133D	Yes	xxx
RCS Hot Leg 1 Wide Range Temperature Sensor	RCS-135A	Yes	xxx
RCS Hot Leg 2 Wide Range Temperature Sensor	RCS-135B	Yes	xxx
RCS Wide Range Pressure Sensor	RCS-140A	Yes	xxx
RCS Wide Range Pressure Sensor	RCS-140B	Yes	xxx
RCS Wide Range Pressure Sensor	RCS-140C	Yes	xxx
RCS Wide Range Pressure Sensor	RCS-140D	Yes	XXX
RCS Hot Leg 1 Level Sensor	RCS-160A	Yes	XXX
RCS Hot Leg 2 Level Sensor	RCS-160B	Yes	XXX
Passive Residual Heat Removal (PRHR) Return Line Temperature Sensor	RCS-161	Yes	xxx
Pressurizer Pressure Sensor	RCS-191A	Yes	XXX
Pressurizer Pressure Sensor	RCS-191B	Yes	XXX
Pressurizer Pressure Sensor	RCS-191C	Yes	XXX
Pressurizer Pressure Sensor	RCS-191D	Yes	XXX
Pressurizer Level Reference Leg Temperature Sensor	RCS-193A	Yes	XXX
Pressurizer Level Reference Leg Temperature Sensor	RCS-193B	Yes	xxx
Pressurizer Level Reference Leg Temperature Sensor	RCS-193C	Yes	xxx
Pressurizer Level Reference Leg Temperature Sensor	RCS-193D	Yes	XXX
Pressurizer Level Sensor	RCS-195A	Yes	XXX
Pressurizer Level Sensor	RCS-195B	Yes	XXX
Pressurizer Level Sensor	RCS-195C	Yes	XXX
Pressurizer Level Sensor	RCS-195D	Yes	XXX
RCP 1A Bearing Water Temperature Sensor	RCS-211A	Yes	XXX

Equipment Name	Tag No.	Seismic Cat. I	EQ As-Built Reconciliation Report(s)
RCP 1A Bearing Water Temperature Sensor	RCS-211B	Yes	xxx
RCP 1A Bearing Water Temperature Sensor	RCS-211C	Yes	xxx
RCP 1A Bearing Water Temperature Sensor	RCS-211D	Yes	XXX
RCP 1B Bearing Water Temperature Sensor	RCS-212A	Yes	xxx
RCP 1B Bearing Water Temperature Sensor	RCS-212B	Yes	XXX
RCP 1B Bearing Water Temperature Sensor	RCS-212C	Yes	XXX
RCP 1B Bearing Water Temperature Sensor	RCS-212D	Yes	XXX
RCP 2A Bearing Water Temperature Sensor	RCS-213A	Yes	xxx
RCP 2A Bearing Water Temperature Sensor	RCS-213B	Yes	xxx
RCP 2A Bearing Water Temperature Sensor	RCS-213C	Yes	XXX
RCP 2A Bearing Water Temperature Sensor	RCS-213D	Yes	xxx
RCP 2B Bearing Water Temperature Sensor	RCS-214A	Yes	xxx
RCP 2B Bearing Water Temperature Sensor	RCS-214B	Yes	xxx
RCP 2B Bearing Water Temperature Sensor	RCS-214C	Yes	XXX
RCP 2B Bearing Water Temperature Sensor	RCS-214D	Yes	XXX
RCP 1A Pump Speed Sensor	RCS-281	Yes	XXX
RCP 1B Pump Speed Sensor	RCS-282	Yes	XXX
RCP 2A Pump Speed Sensor	RCS-283	Yes	xxx
RCP 2B Pump Speed Sensor	RCS-284	Yes	XXX