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U.S. Nuclear Regulatory Commission
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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load
Item 2.2.04.05a.iii [Index Number 228]

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 2.2.04.05a.iii [Index Number 228] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.2.04.05a.iii [Index Number 228]. 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

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3
Completion Plan for Uncompleted ITAAC 2.2.04.05a.iii [Index Number 228]

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Southern Nuclear Operating Company
ND-16-2135
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3
Completion Plan for Uncompleted ITAAC 2.2.04.05a.iii [Index Number 228]

Subject: Uncompleted ITAAC 2.2.04.05a.iii [Index No. 228]

ITAAC Statement

Design Commitment

5.a) The seismic Category I equipment identified in Table 2.2.4-1 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 2.2.4-1 (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 2.2.4-1 is verified by type tests, analyses, or a combination of type tests and analyses in accordance with ITAAC 2.2.04.05a.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.

In accordance with EQ Walkdown Inspection Procedure XYZ (Reference 3), an inspection is conducted of the Steam Generator System 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 2.2.4-1, 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)

1. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.04.05a.ii [Index No. 227]
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 2.2.04.05a.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 2.2.4-1

ITAAC COMPLIANCE MATRIX FOR SEISMIC CATEGORY I EQUIPMENT
(STEAM GENERATOR SYSTEM)

Equipment Name	Tag No.	Seismic Cat. I	EQ As-Built Reconciliation Report(s)
Main Steam Safety Valve SG01	SGS-PL-V030A	Yes	XXX
Main Steam Safety Valve SG02	SGS-PL-V030B	Yes	XXX
Main Steam Safety Valve SG01	SGS-PL-V031A	Yes	XXX
Main Steam Safety Valve SG02	SGS-PL-V031B	Yes	XXX
Main Steam Safety Valve SG01	SGS-PL-V032A	Yes	XXX
Main Steam Safety Valve SG02	SGS-PL-V032B	Yes	XXX
Main Steam Safety Valve SG01	SGS-PL-V033A	Yes	XXX
Main Steam Safety Valve SG02	SGS-PL-V033B	Yes	XXX
Main Steam Safety Valve SG01	SGS-PL-V034A	Yes	XXX
Main Steam Safety Valve SG02	SGS-PL-V034B	Yes	XXX
Main Steam Safety Valve SG01	SGS-PL-V035A	Yes	XXX
Main Steam Safety Valve SG02	SGS-PL-V035B	Yes	XXX
Power-operated Relief Valve Block Motor-operated Valve Steam Generator 01	SGS-PL-V027A	Yes	XXX
Power-operated Relief Valve Block Motor-operated Valve Steam Generator 02	SGS-PL-V027B	Yes	XXX
Steam Line Condensate Drain Isolation Valve	SGS-PL-V036A	Yes	XXX
Steam Line Condensate Drain Isolation Valve	SGS-PL-V036B	Yes	XXX
Main Steam Line Isolation Valve	SGS-PL-V040A	Yes	XXX
Main Steam Line Isolation Valve	SGS-PL-V040B	Yes	XXX
Steam Line Condensate Drain Control Valve	SGS-PL-V086A	Yes	XXX
Steam Line Condensate Drain Control Valve	SGS-PL-V086B	Yes	XXX
Main Feedwater Isolation Valve	SGS-PL-V057A	Yes	XXX
Main Feedwater Isolation Valve	SGS-PL-V057B	Yes	XXX
Startup Feedwater Isolation Motor-operated Valve	SGS-PL-V067A	Yes	XXX
Startup Feedwater Isolation Motor-operated Valve	SGS-PL-V067B	Yes	XXX
Steam Generator Blowdown Isolation Valve	SGS-PL-V074A	Yes	XXX
Steam Generator Blowdown Isolation Valve	SGS-PL-V074B	Yes	XXX
Steam Generator Blowdown Isolation Valve	SGS-PL-V075A	Yes	XXX

Equipment Name	Tag No.	Seismic Cat. I	EQ As-Built Reconciliation Report(s)
Steam Generator Blowdown Isolation Valve	SGS-PL-V075B	Yes	XXX
Power-operated Relief Valve	SGS-PL-V233A	Yes	XXX
Power-operated Relief Valve	SGS-PL-V233B	Yes	XXX
Main Steam Isolation Valve Bypass Isolation	SGS-PL-V240A	Yes	XXX
Main Steam Isolation Valve Bypass Isolation	SGS-PL-V240B	Yes	XXX
Main Feedwater Control Valve	SGS-PL-V250A	Yes	XXX
Main Feedwater Control Valve	SGS-PL-V250B	Yes	XXX
Startup Feedwater Control Valve	SGS-PL-V255A	Yes	XXX
Startup Feedwater Control Valve	SGS-PL-V255B	Yes	XXX
Steam Generator 1 Narrow Range Level Sensor	SGS-001	Yes	XXX
Steam Generator 1 Narrow Range Level Sensor	SGS–002	Yes	XXX
Steam Generator 1 Narrow Range Level Sensor	SGS–003	Yes	XXX
Steam Generator 1 Narrow Range Level Sensor	SGS–004	Yes	XXX
Steam Generator 2 Narrow Range Level Sensor	SGS–005	Yes	XXX
Steam Generator 2 Narrow Range Level Sensor	SGS–006	Yes	XXX
Steam Generator 2 Narrow Range Level Sensor	SGS–007	Yes	XXX
Steam Generator 2 Narrow Range Level Sensor	SGS-008	Yes	XXX
Steam Generator 1 Wide Range Level Sensor	SGS-011	Yes	XXX
Steam Generator 1 Wide Range Level Sensor	SGS-012	Yes	XXX
Steam Generator 2 Wide Range Level Sensor	SGS-013	Yes	XXX
Steam Generator 2 Wide Range Level Sensor	SGS-014	Yes	XXX
Steam Generator 1 Wide Range Level Sensor	SGS-015	Yes	XXX
Steam Generator 1 Wide Range Level Sensor	SGS-016	Yes	XXX
Steam Generator 2 Wide Range Level Sensor	SGS-017	Yes	XXX
Steam Generator 2 Wide Range Level Sensor	SGS-018	Yes	XXX
Main Steam Line Steam Generator 1	SGS-030	Yes	XXX

Equipment Name	Tag No.	Seismic Cat. I	EQ As-Built Reconciliation Report(s)
Pressure Sensor			
Main Steam Line Steam Generator 1 Pressure Sensor	SGS-031	Yes	XXX
Main Steam Line Steam Generator 1 Pressure Sensor	SGS-032	Yes	XXX
Main Steam Line Steam Generator 1 Pressure Sensor	SGS-033	Yes	XXX
Main Steam Line Steam Generator 2 Pressure Sensor	SGS-034	Yes	XXX
Main Steam Line Steam Generator 2 Pressure Sensor	SGS-035	Yes	XXX
Main Steam Line Steam Generator 2 Pressure Sensor	SGS-036	Yes	XXX
Main Steam Line Steam Generator 2 Pressure Sensor	SGS-037	Yes	XXX
Steam Generator 1 Startup Feedwater Flow Sensor	SGS-55A	Yes	XXX
Steam Generator 1 Startup Feedwater Flow Sensor	SGS-55B	Yes	XXX
Steam Generator 2 Startup Feedwater Flow Sensor	SGS-56A	Yes	XXX
Steam Generator 2 Startup Feedwater Flow Sensor	SGS-56B	Yes	XXX