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Docket No.: 52-025

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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 2.3.06.05a.iii [Index Number 363]

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 2.3.06.05a.iii [Index Number 363] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.3.06.05a.iii [Index Number 363]. 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 2.3.06.05a.iii [Index Number 363]

MJY/kms/amm

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Southern Nuclear Operating Company
ND-16-2140
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3
Completion Plan for Uncompleted ITAAC 2.3.06.05a.iii [Index Number 363]

Subject: Uncompleted ITAAC 2.3.06.05a.iii [Index No. 363]

ITAAC Statement

Design Commitment

5.a) The seismic Category I equipment identified in Table 2.3.6-1 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 2.3.6-1 (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 2.3.6-1 is verified by type tests, analyses, or a combination of type tests and analyses in accordance with ITAAC 2.3.06.05a.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 Normal Residual Heat Removal System (RNS) 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 2.3.6-1, 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 2.3.06.05a.ii [Index No. 362]
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 2.3.06.05a.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 2.3.6-1

ITAAC COMPLIANCE MATRIX FOR SEISMIC CATEGORY I EQUIPMENT
(NORMAL RESIDUAL HEAT REMOVAL SYSTEM)

Equipment Name	Tag No.	Seismic Cat. I	EQ As-Built Reconciliation Report(s)
RNS Pump A (Pressure Boundary)	RNS-MP-01A	Yes	XXX
RNS Pump B (Pressure Boundary)	RNS-MP-01B	Yes	XXX
RNS Heat Exchanger A (Tube Side)	RNS-ME-01A	Yes	XXX
RNS Heat Exchanger B (Tube Side)	RNS-ME-01B	Yes	XXX
RCS Inner Hot Leg Suction Motor-operated Isolation Valve	RNS-PL-V001A	Yes	XXX
RCS Inner Hot Leg Suction Motor-operated Isolation Valve	RNS-PL-V001B	Yes	XXX
RCS Outer Hot Leg Suction Motor-operated Isolation Valve	RNS-PL-V002A	Yes	XXX
RCS Outer Hot Leg Suction Motor-operated Isolation Valve	RNS-PL-V002B	Yes	XXX
RCS Pressure Boundary Thermal Relief Check Valve	RNS-PL-V003A	Yes	XXX
RCS Pressure Boundary Thermal Relief Check Valve	RNS-PL-V003B	Yes	XXX
RNS Discharge Motor-operated Containment Isolation Valve	RNS-PL-V011	Yes	XXX
RNS Discharge Containment Isolation Test Connection	RNS-PL-V012	Yes	XXX
RNS Discharge Header Containment Isolation Check Valve	RNS-PL-V013	Yes	XXX
RNS Discharge RCS Pressure Boundary Check Valve	RNS-PL-V015A	Yes	XXX
RNS Discharge RCS Pressure Boundary Check Valve	RNS-PL-V015B	Yes	XXX
RNS Discharge RCS Pressure Boundary Check Valve	RNS-PL-V017A	Yes	XXX
RNS Discharge RCS Pressure Boundary Check Valve	RNS-PL-V017B	Yes	XXX
RNS Hot Leg Suction Pressure Relief Valve	RNS-PL-V021	Yes	XXX
RNS Suction Header Motor-operated Containment	RNS-PL-V022	Yes	XXX

Equipment Name	Tag No.	Seismic Cat. I	EQ As-Built Reconciliation Report(s)
Isolation Valve			
RNS Suction from IRWST Motor-operated Isolation Valve	RNS-PL-V023	Yes	XXX
RNS Discharge to IRWST Motor-operated Isolation Valve	RNS-PL-V024	Yes	XXX
RNS Pump Discharge Relief	RNS-PL-V045	Yes	XXX
RNS Suction from Cask Loading Pit Motor-operated Isolation Valve	RNS-PL-V055	Yes	XXX
RNS Suction from Cask Loading Pit Check Valve	RNS-PL-V056	Yes	XXX
RNS Pump Miniflow Air-Operated Isolation Valve	RNS-PL-V057A	Yes	XXX
RNS Pump Miniflow Air-Operated Isolation Valve	RNS-PL-V057B	Yes	XXX
RNS Return from Chemical and Volume Control System (CVS) Containment Isolation Valve	RNS-PL-V061	Yes	XXX