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A SOUTHERN COMPANY

Docket No.: 52-025

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ND-16-2181  
10 CFR 52.99(c)(3)

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 2.1.03.09a.ii [Index Number 82]

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 2.1.03.09a.ii [Index Number 82] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.1.03.09a.ii [Index Number 82]. 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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Completion Plan for Uncompleted ITAAC 2.1.03.09a.ii [Index Number 82]

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**Southern Nuclear Operating Company  
ND-16-2181  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion Plan for Uncompleted ITAAC 2.1.03.09a.ii [Index Number 82]**

**Subject: Uncompleted ITAAC 2.1.03.09a.ii [Index No. 82]**

## **ITAAC Statement**

### **Design Commitment**

9.a) *The Class 1E equipment identified in Table 2.1.3-1 as being qualified for a harsh environment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of safety function for the time required to perform the safety function.*

### **Inspections/Tests/Analyses**

ii) *Inspection will be performed of the as-built Class 1E equipment and the associated wiring, cables, and terminations located in a harsh environment.*

### **Acceptance Criteria**

ii) *A report exists and concludes that the as-built Class 1E equipment and the associated wiring, cables, and terminations identified in Table 2.1.3-1 as being qualified for a harsh environment are bounded by type tests, analyses, or a combination of type tests and analyses.*

## **ITAAC Completion Description**

Multiple ITAAC are performed to demonstrate that the Class 1E equipment identified in VEGP Unit 3 Combined License (COL) Appendix C Table 2.1.3-1 (Attachment A) as being qualified for a harsh environment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of safety function for the time required to perform the safety function. The subject ITAAC requires an inspection be performed of the as-built Class 1E equipment and the associated wiring, cables, and terminations located in a harsh environment.

Harsh environment qualification of the components in VEGP Unit 3 COL Appendix C Table 2.1.3-1 is verified by type tests, analyses or a combination of type tests and analyses in accordance with ITAAC 2.1.03.09a.i (Reference 1). Equipment Qualification Data Packages (EQDP) and Equipment Qualification Summary Reports (EQSR) identify the equipment mounting employed for qualification and the environmental conditions tested or analyzed.

In accordance with Equipment Qualification (EQ) Walkdown Inspection Procedure XYZ (Reference 2), an inspection is conducted of the Reactor System (RXS) to confirm the satisfactory installation of the Class 1E components. The inspection includes verification of equipment make/model/serial number; verification of the equipment mounting, wiring, cables, and terminations; and verification of equipment location to confirm that the harsh environmental

conditions for the room in which the component is mounted are bounded by the tested or analyzed conditions.

The documentation of installed configuration of harsh environment qualified components includes photographs and/or sketches of equipment mounting and connections. The verification of installed component configuration is documented in the EQ As-Built Reconciliation Report(s) (Reference 3).

Attachment A identifies the EQ As-Built Reconciliation Report(s) which verify that the installed configuration of the Class 1E equipment identified in VEGP Unit 3 COL Appendix C Table 2.1.3-1 including the associated wiring, cables, and terminations are bounded by the qualified configuration and IEEE Standard 323-1974 (Reference 4). The EQ As-Built Reconciliation Reports are available for NRC inspection as part of the ITAAC Completion Package (Reference 5).

### **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 2.1.03.09a.i [Index No. 81]
2. EQ Walkdown Inspection Procedure XYZ
3. EQ As-Built Reconciliation Report(s) identified in Attachment A
4. IEEE Standard 323-1974, "IEEE Standard for Qualifying Class 1E Equipment for Nuclear Power Generating Stations"
5. ITAAC 2.1.03.09a.ii Completion Package
6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

**Attachment A: Excerpt from COL Appendix C Table 2.1.3-1**

**ITAAC COMPLIANCE MATRIX FOR  
 HARSH ENVIRONMENT QUALIFIED EQUIPMENT  
 (REACTOR SYSTEM)**

<b>Equipment Name</b>	<b>Tag No.</b>	<b>Class 1E/Qual. For Harsh Envir.</b>	<b>EQ As-Built Reconciliation Report</b>
Source Range Detectors (4)	RXS-JE-NE001A/ NE001B/NE001C/NE001D	Yes/Yes	XXX
Intermediate Range Detectors (4)	RXS-JE-NE002A/ NE002B/NE002C/NE002D	Yes/Yes	XXX
Power Range Detectors - Lower (4)	RXS-JE-NE003A/ NE003B/NE003C/NE003D	Yes/Yes	XXX
Power Range Detectors - Upper (4)	RXS-JE-NE004A/ NE004B/NE004C/NE004D	Yes/Yes	XXX