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 8 2016

ND-16-2187 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 2.3.07.07b.iii [Index Number 404]

### 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 2.3.07.07b.iii [Index Number 404] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.3.07.07b.iii [Index Number 404]. 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 2.3.07.07b.iii [Index Number 404]

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. Reves

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-16-2187 Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3
Completion Plan for Uncompleted ITAAC 2.3.07.07b.iii [Index Number 404]

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Subject: Uncompleted ITAAC 2.3.07.07b.iii [Index No. 404]

## **ITAAC Statement**

#### **Design Commitment**

7.b) The SFS provides spent fuel cooling for 7 days by boiling the spent fuel pool water and makeup water from on-site storage tanks.

### Inspections/Tests/Analyses

iii) A safety-related flow path exists from the cask washdown pit to the spent fuel pool.

#### Acceptance Criteria

iii) See item 1 of this table.

# **ITAAC Completion Description**

This ITAAC's Design Commitment is met by reference to ITAAC Item 1 in VEGP Unit 3 Combined License (COL) Appendix C Table 2.3.7-4. Item 1 verifies that the as-built Spent Fuel Pool Cooling System (SFS) conforms with the functional arrangement described in the Design Description of Section 2.3.7 in the VEGP Unit 3 COL Appendix C.

The ITAAC Closure Notification (Reference 1) summarizes the methodology for conducting the Inspections/Tests/Analyses, and the results that demonstrate that the acceptance criteria are met. This closure notification is submitted to the NRC when the supporting ITAAC closure activities are complete.

The records (Tests, Reports, Completed Procedures, Completed Analyses, etc.) that form the ITAAC determination bases are referenced in the closure notification for Item 1 of VEGP Unit 3 COL, Appendix C Table 2.3.7-4 and are available for NRC inspection as part of the ITAAC Completion Package (Reference 2).

## **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 2.3.07.01 [Index No. 391]
- 2. ITAAC 2.3.07.07b.iii Completion Package
- 3. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"