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

SOUTHERN NUCLEAR
A SOUTHERN COMPANY

Docket No.: 52-025

NOV 10 2016

ND-16-2182
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 2.3.06.07a.ii [Index Number 367]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of October 31, 2016, Vogtle Electric Generating Plant (VEGP) Unit 3 Uncompleted Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) Item 2.3.06.07a.ii [Index Number 367] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.3.06.07a.ii [Index Number 367]. 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 2.3.06.07a.ii [Index Number 367]

MJY/kms/amm

To:

Southern Nuclear Operating Company/Georgia Power Company
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. 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
Document Services RTYPE: VND.LI.L06
File AR.01.02.06
cc:

Nuclear Regulatory Commission
Ms. C. Haney (w/o enclosures)
Ms. J. M. Heisserer
Mr. C. P. Patel
Ms. R. C. Reyes
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
Mr. C. J. Even
Ms. V. L. Ordaz

Oglethorpe Power Corporation
Mr. K. T. Haynes
Mr. R. B. Brinkman

Municipal Electric Authority of Georgia
Mr. J. E. Fuller
Mr. S. M. Jackson

Dalton Utilities
Mr. T. Bundros

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. M. Y. Shaqqo
Ms. S. DiTommaso
Mr. A F. Dohse

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*

Southern Nuclear Operating Company
ND-16-2182
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3
Completion Plan for Uncompleted ITAAC 2.3.06.07a.ii [Index Number 367]

Subject: Uncompleted ITAAC 2.3.06.07a.ii [Index No. 367]

ITAAC Statement

Design Commitment

7.a) The Class 1E equipment identified in Table 2.3.6-1 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 2.3.6-1 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 2.3.6-1 (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 2.3.6-1 is verified by type tests, analyses or a combination of type tests and analyses in accordance with ITAAC 2.3.06.07a.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 Normal Residual Heat Removal System (RNS) 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 2.3.6-1 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 2.3.06.07a.i [Index No. 366]
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 2.3.06.07a.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 2.3.6-1

ITAAC COMPLIANCE MATRIX FOR
HARSH ENVIRONMENT QUALIFIED EQUIPMENT
(NORMAL RESIDUAL HEAT REMOVAL SYSTEM)

Equipment Name	Tag No.	Class 1E/Qual. For Harsh Envir.	EQ As-Built Reconciliation Report
RCS Inner Hot Leg Suction Motor-operated Isolation Valve	RNS-PL-V001A	Yes/Yes	XXX
RCS Inner Hot Leg Suction Motor-operated Isolation Valve	RNS-PL-V001B	Yes/Yes	XXX
RCS Outer Hot Leg Suction Motor-operated Isolation Valve	RNS-PL-V002A	Yes/Yes	XXX
RCS Outer Hot Leg Suction Motor-operated Isolation Valve	RNS-PL-V002B	Yes/Yes	XXX
RNS Suction from IRWST Motor-operated Isolation Valve	RNS-PL-V023	Yes/Yes	XXX
RNS Return from Chemical and Volume Control System (CVS) Containment Isolation Valve	RNS-PL-V061	Yes/Yes	XXX