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Docket No.: 52-025

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ND-16-2134  
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 2.1.02.08d.v [Index Number 36]

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 2.1.02.08d.v [Index Number 36] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.1.02.08d.v [Index Number 36]. 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 2.1.02.08d.v [Index Number 36]

MJY/kms/amm

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**Southern Nuclear Operating Company  
ND-16-2134  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion Plan for Uncompleted ITAAC 2.1.02.08d.v [Index Number 36]**

**Subject: Uncompleted ITAAC 2.1.02.08d.v [Index No. 36]**

**ITAAC Statement**

Design Commitment

*8.d) The RCS provides automatic depressurization during design basis events.*

Inspections/Tests/Analyses

v) *Inspections of the elevation of the ADS stage 4 valve discharge will be conducted.*

Acceptance Criteria

v) *The minimum elevation of the bottom inside surface of the outlet of these valves is greater than plant elevation 110 feet.*

**ITAAC Completion Description**

Multiple ITAAC are performed to demonstrate that the VEGP Unit 3 Reactor Coolant System (RCS) provides automatic depressurization during design basis events. The subject ITAAC requires that inspections of the Automatic Depressurization System (ADS) stage 4 valve discharge elevations be conducted to verify that the minimum elevation of the bottom inside surface of each stage 4 valve outlet is greater than plant elevation 110 feet.

The elevation of the bottom inside surface of each ADS valve outlet is measured using survey equipment in accordance with approved site survey and measurement procedures. The measurements are performed after installation of the ADS stage 4 squib valves. The results of the inspections verify the minimum measured elevation of the bottom inside surface of each stage 4 valve outlet is greater than plant elevation 110 feet. The measured plant elevations for the valves are listed below:

<u>Valve Tag Number</u>	<u>Measured Plant Elevation</u>
RCS-PL-V004A	XXX
RCS-PL-V004B	XXX
RCS-PL-V004C	XXX
RCS-PL-V004D	XXX

The inspection results are documented in the Principal Closure Document XXX (Reference 1) supporting the ITAAC 2.1.02.08d.v Completion Package (Reference 2). The inspection results verify that the minimum measured elevation of the bottom inside surface of each stage 4 valve outlet is greater than plant elevation 110 feet. This meets the ITAAC acceptance criteria of greater than plant elevation 110 feet.

Principal Closure Document XXX is available for NRC inspection as part of the ITAAC 2.1.02.08d.v Completion Package.

**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. Principal Closure Document XXX
2. ITAAC 2.1.02.08d.v Completion Package
3. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"