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SOUTHERN NUCLEAR
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10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission
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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 E.3.9.07.01.02 [Index Number 866]

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 E.3.9.07.01.02 [Index Number 866] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC E.3.9.07.01.02 [Index Number 866]. 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 E.3.9.07.01.02 [Index Number 866]

MJY/kms/amm

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Southern Nuclear Operating Company
ND-16-2355
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3
Completion Plan for Uncompleted ITAAC E.3.9.07.01.02 [Index Number 866]

Subject: Uncompleted ITAAC E.3.9.07.01.02 [Index No. 866]

ITAAC Statement

Design Commitment

7.1 The means exists to warn and advise onsite individuals of an emergency, including those in areas controlled by the operator, including:
• Employees not having emergency assignments
• Visitors
• Contractor and construction personnel
• Other persons who may be in the public access areas, on or passing through the site, or within the owner controlled area
[J.1]

Inspections/Tests/Analyses

7.1 A test of the onsite warning and communication capability emergency implementing procedures (EIPs) including protective action guidelines, assembly and accountability, and site dismissal will be performed during a drill.

Acceptance Criteria

7.1.2 Demonstrate the ability to notify and advise onsite personnel including:
1. Non-essential personnel;
2. Visitors;
3. Contractor and construction personnel;
and
4. Other personnel within the owner controlled area.

ITAAC Completion Description

Multiple ITAAC are performed to verify that a means exists to warn and advise the onsite individuals identified in VEGP Unit 3 Combined License (COL) Appendix C Table E.3.9-7, Index No. 866, of an emergency. The subject ITAAC requires that a test of the onsite warning and communication capability Emergency Implementing Procedures (EIPs) including protective action guidelines, assembly and accountability, and site dismissal is performed during a drill to demonstrate the ability to notify and advise onsite personnel including: non-essential personnel, visitors, contractor and construction personnel, and other personnel within the owner controlled area.

The test, in the form of an emergency plan drill, is developed in accordance with NMP-EP-303, Drill and Exercise Standards, (Reference 1). The emergency plan drill scenario is of sufficient severity to demonstrate the ability to notify and advise onsite personnel of an emergency by

testing onsite warning and communication capability EIPs including protective action guidelines, assembly and accountability, and site dismissal performance during the drill.

NMP-EP-303-F01, Drill/Exercise Critique, (Reference 2) is used to critique the emergency plan drill. The Drill/Exercise Critique concludes that the ability to notify and advise onsite personnel including non-essential personnel, visitors, contractor and construction personnel, and other personnel within the owner controlled area is met, by testing the onsite warning and communication capability EIPs including protective action guidelines, assembly and accountability, and site dismissal performance during a drill.

The NMP-EP-303-F01, Drill/Exercise Critique, is available for NRC inspection as part of the ITAAC Completion Package (Reference 3).

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. NMP-EP-303, Drill and Exercise Standards
2. NMP-EP-303-F01, Drill/Exercise Critique
3. ITAAC E.3.9.07.01.02 Completion Package
4. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"