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Docket No.: 52-025

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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 2.3.05.02.iii [Index Number 342]

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 2.3.05.02.iii [Index Number 342] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.3.05.02.iii [Index Number 342]. 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 2.3.05.02.iii [Index Number 342]

MJY/kms/amm

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Southern Nuclear Operating Company
ND-16-2126
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3
Completion Plan for Uncompleted ITAAC 2.3.05.02.iii [Index Number 342]

Subject: Uncompleted ITAAC 2.3.05.02.iii [Index No. 342]

ITAAC Statement

Design Commitment

2. *The seismic Category I equipment identified in Table 2.3.5-1 can withstand seismic design basis loads without loss of safety function.*

Inspections/Tests/Analyses

iii) Inspection will be performed for the existence of a report verifying that the as-built equipment including anchorage is seismically bounded by the tested or analyzed conditions.

Acceptance Criteria

iii) A report exists and concludes that the as-built equipment including anchorage is seismically bounded by the tested or analyzed conditions.

ITAAC Completion Description

Multiple ITAAC are performed to demonstrate that the seismic Category I equipment identified in VEGP Unit 3 Combined License (COL) Appendix C Table 2.3.5-1 (Attachment A) can withstand seismic design basis loads without loss of safety function. The subject ITAAC requires that an inspection is performed for the existence of a report verifying that the as-built equipment including anchorage are seismically bounded by the tested or analyzed conditions.

Seismic qualification of the equipment in VEGP Unit 3 COL Appendix C Table 2.3.5-1 is verified by type tests, analyses, or a combination of type tests and analyses in accordance with ITAAC 2.3.05.02.ii (Reference 1). As part of the Mechanical Handling System (MHS) qualification program, consideration is given to the clearances needed around the equipment mounted in the plant to permit the equipment to move during a postulated seismic event without causing impact between adjacent pieces of safety-related equipment or between safety-related equipment and adjacent non-safety related structures or components. Justification is provided that the equipment will not impact adjacent equipment or structures as part of the Equipment Qualification (EQ) As-Built Reconciliation Report (Reference 2) based on the walkdown inspection.

Seismic analyses of the equipment listed in Attachment A identify the equipment mounting employed for qualification and establish interface requirements for assuring that subsequent in-plant installation does not degrade the established qualification. Interface requirements are defined based on the test configuration and other design requirements.

In accordance with EQ Walkdown Inspection Procedure XYZ (Reference 3), an inspection is conducted of the equipment identified in Attachment A to confirm the satisfactory installation of the seismically qualified equipment. The inspection includes verification of equipment make/model/serial number; verification of as-built equipment mounting orientation, anchorage and clearances; and verification of electrical and other interfaces.

The documentation of installed configuration of seismically qualified equipment includes photographs and/or sketches of equipment/mounting/interfaces. The verification of installed equipment configuration is documented in the EQ As-Built Reconciliation Reports.

Attachment A identifies the EQ As-Built Reconciliation Report(s) which verify that the installed configuration of the Seismic Category I equipment identified in VEGP Unit 3 COL Appendix C Table 2.3.5-1, including anchorage, is seismically bounded by the tested or analyzed conditions and IEEE Standard 344-1987 (Reference 4) and NRC Regulatory Guide 1.100, Rev. 2 (Reference 5). The EQ As-Built Reconciliation Reports are available for NRC inspection as part of the ITAAC Completion Package (Reference 6).

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 2.3.05.02.ii [Index No. 341]
2. EQ As-Built Reconciliation Report(s) as identified in Attachment A
3. EQ Walkdown Inspection Procedure XYZ
4. IEEE Standard 344-1987, "Recommended Practices for Seismic Qualification of Class 1E Equipment for Nuclear Power Generating Stations"
5. Regulatory Guide 1.100, Rev. 2, "Seismic Qualification of Electric and Mechanical Equipment for Nuclear Power Plants"
6. ITAAC 2.3.05.02.iii Completion Package
7. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A: Excerpt from COL Appendix C Table 2.3.5-1

ITAAC COMPLIANCE MATRIX FOR SEISMIC CATEGORY I EQUIPMENT
(MECHANICAL HANDLING SYSTEM)

Equipment Name	Tag No.	Seismic Cat. I	EQ As-Built Reconciliation Report(s)
Containment Polar Crane	MHS-MH-01	Yes	XXX
Cask Handling Crane	MHS-MH-02	Yes	XXX
Equipment Hatch Hoist	MHS-MH-05	Yes	XXX
Maintenance Hatch Hoist	MHS-MH-06	Yes	XXX