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U.S. Nuclear Regulatory Commission
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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load
Item 2.5.01.05 [Index Number 520]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of December 2, 2016, Vogtle Electric Generating Plant (VEGP) Unit 3 Uncompleted Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) Item 2.5.01.05 [Index Number 520] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.5.01.05 [Index Number 520]. 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

U.S. Nuclear Regulatory Commission
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Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3
Completion Plan for Uncompleted ITAAC 2.5.01.05 [Index Number 520]

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**Southern Nuclear Operating Company
ND-16-2533
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3
Completion Plan for Uncompleted ITAAC 2.5.01.05 [Index Number 520]**

Subject: Uncompleted ITAAC 2.5.01.05 [Index No. 520]

ITAAC Statement

Design Commitment

5. *The DAS manual actuation of ADS, IRWST injection, and containment recirculation can be executed correctly and reliably.*

Inspections/Tests/Analyses

See ITAAC Table 3.2-1, item 1.

Acceptance Criteria

See ITAAC Table 3.2-1, item 1.

ITAAC Completion Description

This ITAAC's Design Commitment is met by reference to ITAAC Items 1a, 1b, 1c.i, 1c.ii, 1d, and 1e in VEGP Unit 3 Combined License (COL), Appendix C, Table 3.2-1 (3.2.-1). Item 1a verifies that a report exists and concludes that a task support verification was conducted in conformance with the implementation plan and includes verification that the information and controls provided by the Human-System Interface (HSI) match the display and control requirements generated by the function-based task analyses and the operational sequence analyses. Item 1b verifies that a report exists and concludes that a Human Factors Engineering (HFE) design verification was conducted in conformance with the implementation plan and includes verification that the HSI design is consistent with the AP1000 specific design guidelines developed for each HSI resource. Item 1c.i verifies that a report exists and concludes that the test scenarios listed in the implementation plan for integrated system validation were executed in conformance with the plan and noted human deficiencies were addressed. Item 1c.ii verifies that a report exists and concludes that the test and analysis results demonstrate that the Main Control Room (MCR) operators can perform the following: heat up and start up the plant to 100% power; shut down and cool down the plant to cold shutdown; bring the plant to safe shutdown following the specified transients; bring the plant to a safe, stable state following the specified accidents. Item 1d verifies that a report exists and concludes that HFE design issue resolution verification was conducted in conformance with the implementation plan and includes verification that human factors issues documented in the design issues tracking system have been addressed in the final design. Item 1e verifies that a report exists and concludes that the plant HFE/HSI, as designed at the time of plant startup, is consistent with the HFE/HSI verified in 1.a) through 1.d) (1a,1b,1c.i,1c.ii, 1d).

The ITAAC Closure Notifications (Reference 1, 2, 3, 4, 5, and 6) summarize the methodology for conducting the Inspections/Tests/Analyses, and the results that demonstrate that the

acceptance criteria are met. These closure notifications are 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 basis are referenced in the closure notifications for Item 1a, 1b, 1c.i, 1c.ii, 1d, and 1e of VEGP Unit 3 COL, Appendix C, Table 3.2-1 and are available for NRC inspection as part of the ITAAC Completion Package (Reference 7).

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 3.2.00.01a [Index No. 739]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of 3.2.00.01b [Index No. 740]
3. ND-XX-XXXX ITAAC Closure Notification on Completion of 3.2.00.01c.i [Index No. 741]
4. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.2.00.01c.ii [Index No. 742]
5. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.2.00.01d [Index No. 743]
6. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 3.2.00.01e [Index No. 744]
7. ITAAC 2.5.01.05 Completion Package
8. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"