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A SOUTHERN COMPANY

Docket No.: 52-025

**DEC 05 2016**

ND-16-2419  
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 2.7.02.02 [Index Number 702]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of November 18, 2016, Vogtle Electric Generating Plant (VEGP) Unit 3 Uncompleted Inspection, Test, Analysis, and Acceptance Criteria (ITAAC) Item 2.7.02.02 [Index Number 702] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.7.02.02 [Index Number 702]. 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 2.7.02.02 [Index Number 702]

MJY/kms/amm

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Document Services RTYPE: VND.LI.L06

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**Southern Nuclear Operating Company  
ND-16-2419  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3  
Completion Plan for Uncompleted ITAAC 2.7.02.02 [Index Number 702]**

**Subject: Uncompleted ITAAC 2.7.02.02 [Index No. 702]**

### **ITAAC Statement**

#### **Design Commitment**

2. *The applicable portions of the VWS provide the safety-related function of preserving containment integrity by isolation of the VWS lines penetrating the containment.*

#### **Inspections/Tests/Analyses**

*See ITAAC Table 2.2.1-3, items 1 and 7.*

#### **Acceptance Criteria**

*See ITAAC Table 2.2.1-3, items 1 and 7.*

### **ITAAC Completion Description**

This ITAAC's Design Commitment is met by reference to ITAAC Items 1, 7.i and 7.ii in VEGP Unit 3 Combined License (COL), Appendix C, Table 2.2.1-3. Item 1 demonstrates that the as-built Containment System (CNS) conforms with the functional arrangement as described in the Design Description of Section 2.2.1 in the VEGP Unit 3 COL Appendix C. Item 7.i demonstrates that the leakage rate from containment for the integrated leak rate test is less than  $L_a$ . Item 7.ii demonstrates that the containment purge isolation valves (VFS-PL-V003, -V004, -V009, and -V010) close within 10 seconds, containment vacuum relief isolation valves (VFS-PL-V800A and -V800B) close within 30 seconds, Steam Generator System (SGS) valves SGS-PL-V040A/B and SGS-PL-V057A/B close in less than 5 seconds, and all other containment isolation valves close within 60 seconds upon receipt of an actuation signal.

The ITAAC Closure Notifications (References 1, 2, and 3) 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 Items 1, 7.i, and 7.ii of VEGP Unit 3 COL, Appendix C, Table 2.2.1-3 and are available for NRC inspection as part of the ITAAC Completion Package (Reference 4).

### **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 2.2.01.01 [Index No. 90]
2. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.01.07.i [Index No. 107]
3. ND-XX-XXXX ITAAC Closure Notification on Completion of ITAAC 2.2.01.07.ii [Index No. 108]
4. ITAAC 2.7.02.02 Completion Package
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"