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ND-16-2732
10 CFR 52.99(c)(1)

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3
ITAAC Closure Notification on Completion of ITAAC 2.5.01.03d [Index Number 514]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 3 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.5.01.03d [Index Number 514] for verifying that a report exists and concludes that the Diverse Actuaion System (DAS) equipment has surge withstand capability (SWC) and can withstand the electromagnetic interference (EMI), radio frequency (RFI), and electrostatic discharge (ESD) conditions that exist where the DAS equipment is located in the plant. The closure process for this ITAAC is based on 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.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

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 of ITAAC 2.5.01.03d [Index Number 514]

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**Southern Nuclear Operating Company
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Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC 2.5.01.03d [Index Number 514]**

ITAAC Statement

Design Commitment:

3.d) The DAS has electrical surge withstand capability (SWC), and can withstand the electromagnetic interference (EMI), radio frequency (RFI), and electrostatic discharge (ESD) conditions that exist where the DAS equipment is located in the plant.

Inspections, Tests, Analyses:

Type tests, analyses, or a combination of type tests and analyses will be performed on the equipment.

Acceptance Criteria:

A report exists and concludes that the DAS equipment can withstand the SWC, EMI, RFI and ESD conditions that exist where the DAS equipment is located in the plant.

ITAAC Determination Basis

Electromagnetic Compatibility qualification of the non-safety related Diverse Actuation System (DAS) was performed by a combination of type tests and analyses to demonstrate that the DAS equipment can withstand the SWC, EMI, RFI, and ESD conditions that exist where the DAS equipment is located in the plant (i.e., Auxiliary Building).

The DAS equipment were qualified by a combination of type testing and analysis in accordance with Regulatory Guide 1.180, "Guidelines for Evaluating Electromagnetic and Radio-Frequency Interference in Safety-Related Instrumentation and Control Systems" (Reference 2) and the methodology in APP-GW-G1-002, "AP1000 Plant Equipment Qualification Methodology" (Reference 1) to demonstrate that DAS equipment can withstand the SWC, EMI, RFI and ESD conditions that exist where the DAS equipment is located in the plant.

The results of the tests and analysis are documented in Equipment Qualification Summary Report (EQSR) APP-DAS-VBR-003 and Equipment Qualification Data Package (EQDP) APP-DAS-VBR-002 (References 3 and 4) and conclude that the DAS equipment can withstand the SWC, EMI, RFI and ESD conditions that exist where the DAS equipment is located in the plant.

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all ITAAC findings pertaining to the subject ITAAC and associated corrective actions. This review found that there are three relevant ITAAC findings associated with this ITAAC.

- Notice of Non conformance (NON) 99901043/2012-201-03
- Notice of Non conformance (NON) 99901043/2012-201-04
- Unresolved Item (URI) 99901043/2012-201-03

The corrective actions for each finding have been completed and each finding is closed. The ITAAC completion review document number is included in the Vogtle Unit 3 ITAAC Completion Package for ITAAC 2.5.01.03d (Reference 5) and available for NRC inspection.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.5.01.03d was performed for Vogtle Unit 3 and that the prescribed acceptance criteria are met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. APP-GW-G1-002 Revision 4, "AP1000 Equipment Qualification Methodology"
2. Regulatory Guide 1.180, "Guidelines for Evaluating Electromagnetic and Radio-Frequency Interference in Safety-Related Instrumentation and Control Systems"
3. APP-DAS-VBR-002 Revision 4, "Equipment Qualification Summary Report for the Diverse Actuation System for Use in the AP1000 Plant"
4. APP-DAS-VBR-003 Revision 3, "Equipment Qualification Data Package for the Diverse Actuation System for Use in the AP1000 Plant"
5. SVP_SV0_004211, Attachment 1 "Submittal of Inspections, Test, Analyses and Acceptance Criteria (ITAAC) Completion Package for Unit 3 ITAAC 2.5.01.03d [COL Index Number 514] (DAS Equipment Qualification EMI RFI and ESD)"