

Michael J. Yox  
Regulatory Affairs Director  
Vogtle 3 & 4  
Nuclear Development

Southern Nuclear  
Operating Company, Inc.  
7825 River Road  
Waynesboro, GA 30830  
Tel: 706.848.6459



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10 CFR 52.99(c)(1)

Southern Nuclear Operating Company  
Vogtle Electric Generating Plant Unit 4  
ITAAC Closure Notification on Completion of ITAAC 3.5.00.01.i [Index Number 823]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 4 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 3.5.00.01.i [Index Number 823] for verifying that an inspection was performed and concludes that the seismic Category I equipment identified in VEGP Unit 4 Combined License (COL) Appendix C, Table 3.5-1 are located on the Nuclear Island. 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

MJY/hma/amm

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4  
Completion of ITAAC 3.5.00.01.i [Index Number 823]

**To:**

**Southern Nuclear Operating Company/ Georgia Power Company**

Mr. D. A. Bost (w/o enclosures)  
Mr. M. D. Meier  
Mr. M. D. Rauckhorst (w/o enclosures)  
Mr. D. H. Jones (w/o enclosures)  
Ms. K. D. Fili  
Mr. D. L. McKinney  
Mr. D. L. Fulton  
Mr. C. E. Morrow  
Mr. M. J. Yox  
Mr. D. Woods  
Ms. A. L. Pugh  
Ms. K. M. Stacy  
Mr. A. S. Parton  
Mr. W. A. Sparkman  
Mr. J. P. Redd  
Mr. D. R. Culver  
Mr. F. H. Willis  
Ms. A. C. Chamberlain  
Document Services RTYPE: VND.LI.L06  
File AR.01.02.06

**cc:**

**Nuclear Regulatory Commission**

Mr. W. Jones (w/o enclosures)  
Ms. J. M. Heisserer  
Mr. C. P. Patel  
Mr. M. E. Ernestes  
Mr. G. J. Khouri  
Mr. J. D. Fuller  
Mr. T. E. Chandler  
Ms. S. E. Temple  
Ms. P. Braxton  
Mr. T. C. Brimfield  
Mr. A. J. Lerch  
Mr. C. J. Even  
Ms. V. L. Ordaz

**Oglethorpe Power Corporation**

Mr. K. T. Haynes  
Mr. R. B. Brinkman

**Municipal Electric Authority of Georgia**

Mr. J. E. Fuller  
Mr. S. M. Jackson

**Dalton Utilities**

Mr. T. Bundros

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**WECTEC**

Mr. C. A. Castell

**Westinghouse Electric Company, LLC**

Mr. R. Easterling (w/o enclosures)

Mr. G. Koucheravy (w/o enclosures)

Mr. F. Gill

Ms. L. Iller

Mr. J. Hopkins

Mr. D. Hawkins

Mr. C. F. Landon

Mr. M. Y. Shaqqo

Ms. S. DiTommaso

Mr. A. F. Dohse

**Other**

Mr. J. E. Hesler, Bechtel Power Corporation

Ms. L. Matis, Tetra Tech NUS, Inc.

Dr. W. R. Jacobs, Jr., Ph.D., GDS Associates, Inc.

Mr. S. Roetger, Georgia Public Service Commission

Ms. S. W. Kernizan, Georgia Public Service Commission

Mr. K. C. Greene, Troutman Sanders

Mr. S. Blanton, Balch Bingham

**Southern Nuclear Operating Company  
ND-16-2840  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 4  
Completion of ITAAC 3.5.00.01.i [Index Number 823]**

### **ITAAC Statement**

#### **Design Commitment:**

1. The seismic Category I equipment identified in Table 3.5-1 can withstand seismic design basis loads without loss of safety function.

#### **Inspections, Tests, Analysis:**

- i) Inspection will be performed to verify that the seismic Category I equipment identified in Table 3.5-1 is located on the Nuclear Island.

#### **Acceptance Criteria:**

- i) The seismic Category I equipment identified in Table 3.5-1 is located on the Nuclear Island.

### **ITAAC Determination Basis**

Multiple ITAAC are performed to demonstrate that the equipment identified in VEGP Unit 4 Combined License (COL) Appendix C, Table 3.5-1 can withstand seismic design basis loads without loss of safety function

This ITAAC requires an inspection be performed to verify that the Radiation Monitoring System (RMS) equipment (radiation monitors) identified in Table 3.5-1 (Attachment A) are located on the Nuclear Island, which is a Seismic Category I structure. Subsequent ITAAC 3.5.00.01.ii (Index Number 824) verify that the equipment is seismically qualified and ITAAC 3.5.00.01.iii (Index Number 825) verify that the equipment is installed and seismically bounded for the as-built location (i.e., Nuclear Island). Completion of these multiple ITAAC will confirm the equipment can withstand seismic design basis loads without loss of its safety function.

The instrument and device location plans (References 7-11) which are issued for construction were visually inspected and each radiation monitor listed in Attachment A was verified to be located on the nuclear island per design.

The Containment High Range Monitor locations shown on the instrument and device location plans (References 7-8) were compared to the Nuclear Island General Arrangement Operating Deck El. 135'-3", SV4-1050-P2-001 (Reference 6) and were verified to be located within the bounds of the column lines shown on the Nuclear Island General Arrangement Plan, thereby confirming that this equipment is located on the Nuclear Island.

The MCR Radiation Monitoring Package A and B and the Containment Atmosphere Monitors are located between column lines on their respective instrument and device location plans (References 9-11). These column lines were compared to their respective Nuclear Island General Arrangement Plan at El 66'-6", SV4-1010-P2-001 (Reference 3); Nuclear Island General Arrangement Plan at El 82'-6", SV4-1020-P2-001 (Reference 4); Nuclear Island General Arrangement Plan at El 100'-0" & 107'-2", SV4-1030-P2-001 (Reference 5); and were verified to be located within the bounds of the column lines shown on the Nuclear Island

General Arrangement Plan, thereby confirming that this equipment is located on the Nuclear Island.

The results of the inspections are documented in the Inspection Report (Reference 1) and conclude that the seismic Category I equipment identified in Table 3.5-1 is located on the Nuclear Island.

### **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 no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review document number is included in the Vogtle Unit 4 ITAAC Completion Package for ITAAC 3.5.00.01.i (Reference 2) and available for NRC inspection.

### **ITAAC Completion Statement**

Based on the above information, SNC hereby notifies the NRC that ITAAC 3.5.00.01.i was performed for VEGP Unit 4 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. SV4-RMS-ITR-004, Revision 0, "Inspection Report Confirming Radiation Monitoring System (RMS) Seismic Category I Equipment is Located on the Nuclear Island, ITAAC 3.5.00.01.i"
2. SVP\_SV0\_004602, Attachment 1, "Submittal of Inspections, Tests, Analyses and Acceptance Criteria (ITAAC) Completion Package for Unit 4 ITAAC 3.5.00.01.i [COL Index Number 823] (RMS System Seismic Category I Equipment Location)"
3. SV4-1010-P2-001, Revision 1, "Nuclear Island General Arrangement Plan At El. 66'-6"
4. SV4-1020-P2-001, Revision 0, "Nuclear Island General Arrangement Plan at El 82'-6"
5. SV4-1030-P2-001, Revision 1, "Nuclear Island General Arrangement Plan at El 100'-0" & 107'-2"
6. SV4-1050-P2-001, Revision 0, "Nuclear Island General Arrangement Operating Deck El. 135'-3"
7. SV4-1150-J2-001, Revision 1, "Containment Building Instrument and Device Location Plan El 135'-3" Areas 1 & 2"

8. SV4-1150-J2-002, Revision 1, "Containment Building Instrument and Device Location Plan  
EI 135'-3" Areas 3 & 4"
9. SV4-1214-J2-001, Revision 4, "Auxiliary Building Area 4 Instrument Installation Plan at  
Elevation 66'-6"
10. SV4-1222-J2-001, Revision 3, "Auxiliary Building Area 2 Instrument Installation Plan at  
Elevation 82'-6"
11. SV4-1232-J2-001, Revision 4, "Auxiliary Building Area 2 Instrument Installation Plan at  
Elevation 100'-0"

**Attachment A**

SYSTEM: Radiation Monitoring System (RMS)

Excerpt from COL Appendix C Table 3.5-1\*

<b>Equipment Name*</b>	<b>Tag No.*</b>	<b>Seismic Cat. I*</b>	<b>Instrument and Device Location Drawing</b>	<b>General Arrangement Drawing</b>
Containment High Range Monitor	PXS-RE160	Yes	SV4-1150-J2-002 Reference 8	SV4-1050-P2-001 Reference 6
Containment High Range Monitor	PXS-RE161	Yes	SV4-1150-J2-001 Reference 7	SV4-1050-P2-001 Reference 6
Containment High Range Monitor	PXS-RE162	Yes	SV4-1150-J2-001 Reference 7	SV4-1050-P2-001 Reference 6
Containment High Range Monitor	PXS-RE163	Yes	SV4-1150-J2-002 Reference 8	SV4-1050-P2-001 Reference 6
MCR Radiation Monitoring Package A	VBS-JS01A	Yes	SV4-1222-J2-001 Reference 10	SV4-1020-P2-001 Reference 4
MCR Radiation Monitoring Package B	VBS-JS01B	Yes	SV4-1232-J2-001 Reference 11	SV4-1030-P2-001 Reference 5
Containment Atmosphere Monitor (Gaseous)	PSS-RE026	Yes	SV4-1214-J2-001 Reference 9	SV4-1010-P2-001 Reference 3
Containment Atmosphere Monitor (particulate, for RCS pressure boundary leakage detection)	PSS-RE027	Yes	SV4-1214-J2-001 Reference 9	SV4-1010-P2-001 Reference 3