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10 CFR 52.99(c)(1)

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3 and Unit 4
ITAAC Closure Notification on Completion of ITAAC 2.5.02.07c [Index Number 536]

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 and Unit 4 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.5.02.07c [Index Number 536] for verifying that data communication between safety and nonsafety systems does not inhibit the performance of the safety function. 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,

Amanda Pugh
Licensing Manager Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion of ITAAC 2.5.02.07c [Index Number 536]

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ND-17-0950

Page 2 of 3

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ND-17-0950

Page 3 of 3

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**Southern Nuclear Operating Company
ND-17-0950
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion of ITAAC 2.5.02.07c [Index Number 536]**

ITAAC Statement

Design Commitment:

7.c) Data communication between safety and nonsafety systems does not inhibit the performance of the safety function.

Inspections, Tests, Analyses:

Type tests, analyses, or a combination of type tests and analyses of the PMS gateways will be performed.

Acceptance Criteria:

A report exists and concludes that data communication between safety and nonsafety systems does not inhibit the performance of the safety function.

ITAAC Determination Basis

The subject ITAAC requires type tests, analyses, or a combination of type tests and analyses of the Protection and Safety Monitoring System (PMS) gateways be performed to verify that the data communication between safety and nonsafety systems does not inhibit the performance of the safety function.

Analysis was performed which consisted of a review of the design documentation and physical arrangement of the PMS gateways to demonstrate that the methods of data communication from the safety system to the nonsafety system through PMS gateways would not inhibit the performance of the required safety function in PMS. PMS gateways are used to transmit data from each division of the PMS to the Data Display and Processing System (DDS) using a single unidirectional fiber optic data communication link that prevents all data flow (data, protocols, and handshaking) from the nonsafety system to the safety system providing the communication isolation as described in Institute of Electrical and Electronic Engineers (IEEE) Standard 7-4.3.2 (Reference 1). Due to the data communication arrangement, type testing is not necessary. The flow of information between the two gateway subsystems is strictly from the safety subsystem to the nonsafety subsystem. The unidirectional nature of the gateway is assured by the use of a single fiber to connect the two gateway subsystems. Within the safety system, the fiber is connected to an optical transmitter. Within the nonsafety system, the fiber is connected to a fiber-optic receiver.

The results of the analysis are documented in APP-GW-GLR-803, "Technical Report to Support ITAAC 2.5.02.07c: Data Communications between Safety and Non-Safety Systems" (Reference 2), which concludes that data communication between safety and nonsafety systems does not inhibit the performance of the safety function.

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 3 and Unit 4 ITAAC Completion Packages for ITAAC 2.5.02.07c (References 3 and 4 respectively) and is available for NRC inspection.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.5.02.07c was performed for VEGP Unit 3 and 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. Institute of Electrical and Electronic Engineers (IEEE) Standard 7-4.3.2-1993, "IEEE Standard Criteria for Digital Computers in Safety Systems of Nuclear Power Generating Stations"
2. APP-GW-GLR-803, Revision 0, "Technical Report to Support ITAAC 2.5.02.07c: Data Communication between Safety and Non-Safety Systems"
3. SVP_SV0_004877, "Submittal of Inspections, Tests, Analyses and Acceptance Criteria (ITAAC) Completion Package for Unit 3 ITAAC 2.5.02.07c [COL Index Number 536] (PMS Data Communication Does Not Inhibit Safety Function), Attachment: 1. ITAAC Completion Package for Unit 3 ITAAC 2.5.02.07c"
4. SVP_SV0_004878, "Submittal of Inspections, Tests, Analyses and Acceptance Criteria (ITAAC) Completion Package for Unit 4 ITAAC 2.5.02.07c [COL Index Number 536] (PMS Data Communication Does Not Inhibit Safety Function), Attachment: 1. ITAAC Completion Package for Unit 4 ITAAC 2.5.02.07c"