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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3 and Unit 4
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load
Item 2.2.01.11a.iii [Index Number 116]

Ladies and Gentlemen:
Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of June 21, 2017, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspection, Test, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.01.11a.iii [Index Number 116] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.2.01.11a.iii Index Number 116]. 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)(3) 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

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.2.01.11a.iii [Index Number 116]

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Southern Nuclear Operating Company
ND-17-1134
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 and 4
Completion Plan for Uncompleted ITAAC 2.2.01.11a.iii [Index Number 116]

ITAAC Statement

Design Commitment

11.a) The motor-operated and check valves identified in Table 2.2.1-1 perform an active safety-related function to change position as indicated in the table.

Inspections/Tests/Analyses

iii) Tests of the motor-operated valves will be performed under preoperational flow, differential pressure, and temperature conditions.

Acceptance Criteria

iii) Each motor-operated valve changes position as indicated in Table 2.2.1-1 under pre-operational test conditions.

ITAAC Completion Description

Multiple ITAAC are performed to verify that the motor-operated and check valves identified in Combined License (COL) Appendix C Table 2.2.1-1 (Attachment A) perform an active safety-related function to change position as indicated in Attachment A. The subject ITAAC verifies testing of the motor-operated valves (MOVs) under preoperational flow, differential pressure, and temperature conditions.

Testing is performed in accordance with Unit 3 and Unit 4 preoperational test procedures SV3-SFS-T1P-502 and SV4-SFS-T1P-502 (References 1 and 2, respectively), SV3-CCS-T1P-501 and SV4-CCS-T1P-501 (References 3 and 4, respectively) and SV3-VFS-T1P-501 and SV4-VFS-T1P-501 (References 5 and 6, respectively) to verify that the motor-operated valves identified in Attachment A perform an active safety-related function to change position as indicated in Attachment A. Testing is performed on the MOVs under pre-operational flow, differential pressure, and temperature conditions and each MOV is verified to change positions as indicated in Attachment A.

References 1 and 2 confirm that each of the Spent Fuel Pool Cooling System (SFS) MOVs listed in Attachment A can be closed under preoperational flow, differential pressure, and temperature conditions. The SFS discharge line containment isolation valve is verified to be open during recirculation of the In-Containment Refueling Water Storage Tank (IRWST) and is then closed. The valve position is verified in the Main Control Room (MCR) and locally. The SFS suction line containment isolation valves are tested during gravity fill of the cask loading pit by opening both valves and starting the gravity fill. Flow is verified and then one of the containment suction isolation valves is closed to verify closure under dynamic flow conditions. The valve is verified to have stopped flow and position verification is performed in the MCR and locally. The first suction valve is then reopened and the closure test is repeated for the other containment suction isolation valve. The results of the Unit 3 and Unit 4 tests are documented in preoperational test results reports SV3-SFS-T2R-502 and SV4-SFS-T2R-502 (References 7 and 8, respectively).

References 3 and 4 confirm that each of the Unit 3 and Unit 4 Component Cooling Water System (CCS) MOVs listed in Attachment A can be closed under preoperational flow, differential pressure, and temperature conditions. The CCS system is aligned with normal flow to and from containment with the A CCS pump in service. The CCS MOVs in Attachment A are closed one at a time, verified to be closed by MCR indication and locally and then reopened to reestablish system flow. The results of this test are documented in Unit 3 and Unit 4 preoperational test results reports SV3-CCS-T2R-501 and SV4-CCS-T2R-501 (References 9 and 10, respectively).

References 3 and 4 confirm that each of the Containment Air Filtration System (VFS) MOVs listed in Attachment A can be closed and opened under preoperational flow, differential pressure, and temperature conditions. The VFS is in a normal system alignment and each of the MOVs listed in Attachment A are operated to the open position, verified locally and in the MCR and then operated to the closed position and verified locally and in the MCR. The results of this test are documented in Unit 3 and Unit 4 preoperational test results reports SV3-VFS-T2R-501 and SV4-VFS-T2R-501 (References 11 and 12, respectively).

References 7, 8, 9, 10, 11 and 12 confirm that each motor-operated valve changes position as indicated in Attachment A under pre-operational test conditions. References 1 through 12 are available for NRC inspection as part of the ITAAC 2.2.01.11a.iii Completion Package (Reference 13).

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. SV3-SFS-T1P-502, "Spent Fuel Pool Cooling System Preoperational Test Procedure"
2. SV4-SFS-T1P-502, "Spent Fuel Pool Cooling System Preoperational Test Procedure"
3. SV3-CCS-T1P-501, "Component Cooling Water System Preoperational Test Procedure"
4. SV4-CCS-T1P-501, "Component Cooling Water System Preoperational Test Procedure"
5. SV3-VFS-T1P-501, "Containment Air Filtration System Preoperational Test Procedure"
6. SV4-VFS-T1P-501, "Containment Air Filtration System Preoperational Test Procedure"
7. SV3-SFS-T2R-502, "Spent Fuel Pool Cooling System Preoperational Test Results Report"
8. SV4-SFS-T2R-502, "Spent Fuel Pool Cooling System Preoperational Test Results Report"
9. SV3-CCS-T2R-501, "Component Cooling Water System Preoperational Test Results Report"
10. SV4-CCS-T2R-501, "Component Cooling Water System Preoperational Test Results Report"
11. SV3-VFS-T2R-501, "Containment Air Filtration System Preoperational Test Results Report"
12. SV4-VFS-T2R-501, "Containment Air Filtration System Preoperational Test Results Report"
13. ITAAC 2.2.01.11a.iiii Completion Package
14. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

Attachment A

Excerpt from COL Appendix C Table 2.2.1-1

Equipment Name	Tag No.	Active Function
Component Cooling Water System (CCS) - Containment Isolation Motor-Operated Valve (MOV) – Inlet Line Outside Reactor Containment (ORC)	CCS-PL-V200	Transfer Closed
CCS Containment Isolation MOV – Outlet Line IRC	CCS-PL-V207	Transfer Closed
CCS Containment Isolation MOV – Outlet Line ORC	CCS-PL-V208	Transfer Closed
SFS Discharge Line Containment Isolation MOV - ORC	SFS-PL-V038	Transfer Closed
SFS Suction Line Containment Isolation MOV - IRC	SFS-PL-V034	Transfer Closed
SFS Suction Line Containment Isolation MOV - ORC	SFS-PL-V035	Transfer Closed
Vacuum Relief Containment Isolation A MOV - ORC	VFS-PL-V800A	Transfer Closed/ Transfer Open
Vacuum Relief Containment Isolation B MOV - ORC	VFS-PL-V800B	Transfer Closed/ Transfer Open