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Docket Nos.: 52-025

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ND-17-1135 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 and Unit 4
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load
ITAAC 2.2.02.10c [Index Number 153]

#### Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of June 27, 2017, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.02.10c [Index Number 153] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.2.02.10c [Index Number 153]. 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

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Enclosure:

Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Completion Plan for Uncompleted ITAAC 2.2.02.10c [Index Number 153]

MJY/BH/amw

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Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Completion Plan for Uncompleted ITAAC 2.2.02.10c [Index Number 153] U.S. Nuclear Regulatory Commission ND-17-1135 Enclosure Page 2 of 4

### **ITAAC Statement**

### **Design Commitment**

10.c) The valves identified in Table 2.2.2-1 as having DAS control perform an active safety function after receiving a signal from the DAS.

### Inspections/Tests/Analyses

Testing will be performed on remotely operated valves listed in Table 2.2.2-1 using real or simulated signals into the DAS.

### Acceptance Criteria

The remotely operated valves identified in Table 2.2.2-1 as having DAS control perform the active function identified in the table after receiving a signal from the DAS.

### **ITAAC Completion Description**

Testing is performed in accordance with Unit 3 and Unit 4 preoperational test procedures SV3-DAS-T1P-501 and SV4-DAS-T1P-501 (References 1 and 2, respectively) to verify that the remotely operated valves identified in Combined License (COL) Appendix C Table 2.2.2-1 (Attachment A) as having Diverse Actuation System (DAS) control perform an active safety function after receiving a signal from DAS. Real or simulated signals are provided into the DAS and the valves in Attachment A are confirmed to perform the active function after receiving a signal from the DAS.

The preoperational testing confirms that each of the Passive Containment Cooling Water Storage Tank (PCCWST) isolation valves that have DAS control receive a signal from DAS and perform the required active function. Initially, the valves are verified to be in the non-actuated position (closed). The valves are remotely operated by manually initiating a containment cooling signal at the DAS panel in the Main Control Room (MCR) and verifying the valves perform their active function (transfer open). Each valve is verified to open using the MCR display as well as local inspection of each valve.

The Unit 3 and Unit 4 preoperational test results reports SV3-DAS-T2R-501 and SV4-DAS-T2R-501 (References 3 and 4, respectively) document that the remotely operated valves listed in Attachment A as having DAS control perform the active function identified in Attachment A after receiving a signal from DAS.

References 1, 2, 3 and 4 are available for NRC inspection as part of the ITAAC 2.2.02.10c Completion Package (Reference 5).

#### **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.

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## References (available for NRC inspection)

- 1. SV3-DAS-T1P-501, "Diverse Actuation System Preoperational Test Procedure"
- 2. SV4-DAS-T1P-501, "Diverse Actuation System Preoperational Test Procedure"
- 3. SV3-DAS-T2R-501, "Diverse Actuation System Preoperational Test Results Report"
- 4. SV4-DAS-T2R-501, "Diverse Actuation System Preoperational Test Results Report"
- 5. ITAAC 2.2.02.10c Completion Package
- 6. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52"

## Attachment A

# **Excerpt from COL Appendix C Table 2.2.2-1**

Tag No.	Component Name	<b>Active Function</b>
PCS-PL-V001A	PCCWST Isolation Valve	Transfer Open
PCS-PL-V001B	PCCWST Isolation Valve	Transfer Open
PCS-PL-V001C	PCCWST Isolation Valve MOV	Transfer Open