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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 2.5.01.02b [Index Number 507]

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 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.5.01.02b [Index Number 507] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.5.01.02b [Index Number 507]. 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,

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Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.5.01.02b [Index Number 507]

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Southern Nuclear Operating Company
ND-17-1129
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.5.01.02b [Index Number 507]

ITAAC Statement

Design Commitment

2.b) The DAS provides automatic actuation of selected functions, as identified in Table 2.5.1-1, separate from the PMS.

Inspections/Tests/Analyses

Electrical power to the PMS equipment will be disconnected and an operational test of the as-built DAS will be performed using real or simulated test signals.

Acceptance Criteria

Appropriate DAS output signals are generated after the test signal reaches the specified limit.

ITAAC Completion Description

Testing is performed in accordance with the 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 Diverse Actuation System (DAS) provides automatic actuation of selected functions, as identified in Combined License (COL) Appendix C Table 2.5.1-1 (Attachment A), separate from the Protection and Safety Monitoring System (PMS).

The preoperational test de-energizes PMS and then simulates the instrument conditions and combinations to generate inputs to the as-built DAS. Due to the de-energized condition of PMS, component condition is verified by locally inspecting the component or use of a solenoid magnetic tester or precision multimeter for relay contact condition.

Each Steam Generator (SG) has two DAS wide range level channels and DAS must receive a low level signal from each SG to actuate the appropriate logic. Each of the four combinations of low level signals required for actuation are simulated at the terminal blocks of the instrumentation. Once the simulated test signal reaches the specified limit, actuation of the automatic Reactor Trip relay, Turbine Trip relay, Core Makeup Tank (CMT) relay, Reactor Coolant Pump (RCP) trip relay, Passive Residual Heat Removal (PRHR) actuation relay, and In-containment Refueling Water Storage Tank (IRWST) gutter isolation relay are verified locally.

Each Reactor Coolant System (RCS) hot leg has one DAS temperature indication and DAS must receive a High RCS hot leg temperature condition from both to actuate the appropriate logic. High RCS hot leg temperature conditions are simulated for both DAS Hot Leg Temperature elements at the terminal blocks of the instruments. Once the simulated test signal reaches the specified limit, actuation of the automatic Reactor Trip relay, Turbine Trip relay, PRHR Actuation relay, and IRWST gutter isolation relay are verified locally.

The Pressurizer has two DAS level indications and DAS must receive a Low Pressurizer Water Level from both of them to actuate the appropriate logic. A low level signal is simulated for both Pressurizer Water Level instruments at the terminal blocks of the instruments. Once the simulated test signal reaches the specified limit, actuation of the automatic Reactor Trip relay, Turbine Trip relay, CMT relay, and RCP Trip relay are verified locally.

Containment has two DAS temperature indications and DAS must receive a High Containment Temperature condition from both to actuate the appropriate logic. A high temperature signal is simulated at the terminal blocks of the instruments. Once the simulated test signal reaches the specified limit, actuation of the automatic Containment Isolation relay and Passive Containment Cooling relay are verified locally.

The reports documenting the Unit 3 and Unit 4 preoperational test results, SV3-DAS-T2R-501 and SV4-DAS-T2R-501 (References 3 and 4, respectively), confirm that appropriate DAS output signals are generated after the test signal reaches the specified limit.

References 1, 2, 3, and 4 are available for NRC inspection as part of the ITAAC 2.5.01.02b 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.

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 2.5.01.02b 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 2.5.1-1

Table 2.5.1-1 Functions Automatically Actuated by the DAS
1. Reactor and Turbine Trip on Low Wide-range Steam Generator Water Level or Low Pressurizer Water Level or High Hot Leg Temperature
2. Passive Residual Heat Removal (PRHR) Actuation and In-containment Refueling Water Storage Tank (IRWST) Gutter Isolation on Low Wide-range Steam Generator Water Level or on High Hot Leg Temperature
3. Core Makeup Tank (CMT) Actuation and Trip All Reactor Coolant Pumps on Low Wide-Range Steam Generator Water Level or Low Pressurizer Water Level
4. Isolation of Selected Containment Penetrations and Initiation of Passive Containment Cooling System (PCS) on High Containment Temperature