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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 2.1.02.11c.i [Index Number 51]

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 2.1.02.11c.i [Index Number 51] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.1.02.11c.i [Index Number 51]. 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 2.1.02.11c.i [Index Number 51]

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Southern Nuclear Operating Company
ND-17-1166
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4
Completion Plan for Uncompleted ITAAC 2.1.02.11c.i [Index Number 51]

ITAAC Statement

Design Commitment

11.c) The valves identified in Table 2.1.2-1 as having DAS control perform an active safety function after receiving a signal from DAS.

Inspections/Tests/Analyses

i) Testing will be performed on the squib valves identified in Table 2.1.2-1 using real or simulated signals into the DAS without stroking the valve.

Acceptance Criteria

i) The squib valves receive a signal at the valve electrical leads that is capable of actuating the squib valve.

ITAAC Completion Description

Multiple ITAAC are performed to verify that the valves identified in Combined License (COL) Appendix C Table 2.1.2-1 (Attachment A) as having Diverse Actuation System (DAS) control perform an active safety function after receiving a signal from DAS. The subject ITAAC performs testing on the squib valves listed in Attachment A.

The preoperational test 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 valves identified in Attachment A as having DAS control perform an active safety function after receiving a signal from DAS. Testing is performed on the squib valves identified in using real signals into the DAS without stroking the valve and ensuring the squib valves receive a signal at the valve electrical leads that is capable of actuating the squib valve.

Each squib valve identified in Attachment A has the squib valve igniters replaced with test resistor fixtures. The squib valves are armed using the manual controls on the DAS panel and then actuated with the DAS controls. A multimeter along with a Data Acquisition (DAQ) system is used to measure both firing current and voltage. Containment temperature is also measured at multiple locations multiple times to correct test resistance to the maximum resistance expected during accident conditions. The minimum signal necessary to actuate the squib valves is specified in valve design information as at least 3.7 amperes for 10 milliseconds. The information recorded during testing of temperature, voltage, and firing current is utilized to confirm that a sufficient test signal is received at the squib valve.

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 each squib valve, identified in the Attachment A, receives an electrical signal at the valve electrical leads that is capable of actuating the squib valve after a signal is input to the DAS.

References 1, 2, 3 and 4 are available for NRC inspection as part of the ITAAC 2.1.02.11c.i 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 2.1.02.11c.i 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 2.1.2-1

Equipment Name	Tag No.	Control PMS/ DAS
Fourth-stage ADS Squib Valve	RCS-PL-V004A	Yes/Yes
Fourth-stage ADS Squib Valve	RCS-PL-V004B	Yes/Yes
Fourth-stage ADS Squib Valve	RCS-PL-V004C	Yes/Yes
Fourth-stage ADS Squib Valve	RCS-PL-V004D	Yes/Yes