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ND-17-1167  
10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission  
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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 2.2.02.11c.ii [Index Number 52]

Ladies and Gentlemen:

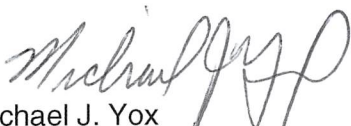
Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of June 21, 2017, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.02.11c.ii [Index Number 52] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.2.02.11c.ii [Index Number 52]. 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

U.S. Nuclear Regulatory Commission  
ND-17-1167  
Page 2 of 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.2.02.11c.ii [Index Number 52]

MJY/DWM/amw

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**Southern Nuclear Operating Company  
ND-17-1167  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.1.02.11c.ii [Index Number 52]**

## **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**

ii) Testing will be performed on the other remotely operated valves identified in Table 2.1.2-1 using real or simulated signals into the DAS.

### **Acceptance Criteria**

ii) The other remotely operated valves identified in Table 2.1.2-1 as having DAS control perform the active function identified in the table after receiving a signal from DAS.

## **ITAAC Completion Description**

Multiple ITAAC are performed to verify that the valves identified in Combined License (COL) Appendix C Table 2.1.2-1 as having Diverse Actuation System (DAS) control perform an active safety function after receiving a signal from DAS. The subject ITAAC performs testing on each Automatic Depressurization System (ADS) stage 1, 2, and 3 motor operated valve (MOV) and ADS motor operated isolation valve.

The preoperational tests are 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 confirm that the other remotely operated valves identified in Table 2.1.2-1 (Attachment A) as having DAS control perform an active safety function after receiving a signal from DAS. Testing is performed on the other remotely operated valves identified in Attachment A using real or simulated signals into the DAS to verify they perform the active function identified in the table after receiving a signal from DAS.

References 1 and 2 demonstrate that each ADS stage 1, 2, and 3 valve and ADS isolation valve receives a signal from DAS and performs the active function required. The valves are tested one stage at a time and the tested valves are initially verified closed. The ADS control switches on the DAS control panel in the Main Control Room (MCR) will be placed to OPEN and the valves are verified to OPEN. The valves are verified locally and in the MCR to be in the OPEN position.

The reports documenting the Unit 3 and Unit 4 preoperational test results, SV3-DAS-T2R-501 and SV4-T2R-501 (References 3 and 4 respectively), confirm the other remotely operated valves identified in Table 2.1.2-1 as having DAS control perform the active function identified in the table after receiving a signal from DAS.

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

<b>Tag No.</b>	<b>Equipment Name</b>	<b>Active Function</b>	<b>Control PMS/DAS</b>
RCS-PL-V001A	First-stage ADS Motor-operated Valve (MOV)	Transfer Open	Yes/Yes
RCS-PL-V001B	First-stage ADS MOV	Transfer Open	Yes/Yes
RCS-PL-V011A	First-stage ADS Isolation MOV	Transfer Open	Yes/Yes
RCS-PL-V011B	First-stage ADS Isolation MOV	Transfer Open	Yes/Yes
RCS-PL-V002A	Second-stage ADS MOV	Transfer Open	Yes/Yes
RCS-PL-V002B	Second-stage ADS MOV	Transfer Open	Yes/Yes
RCS-PL-V012A	Second-stage ADS Isolation MOV	Transfer Open	Yes/Yes
RCS-PL-V012B	Second-stage ADS Isolation MOV	Transfer Open	Yes/Yes
RCS-PL-V003A	Third-stage ADS MOV	Transfer Open	Yes/Yes
RCS-PL-V003B	Third-stage ADS MOV	Transfer Open	Yes/Yes
RCS-PL-V013A	Third-stage ADS Isolation MOV	Transfer Open	Yes/Yes
RCS-PL-V013B	Third-stage ADS Isolation MOV	Transfer Open	Yes/Yes