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ND-17-1132 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 Item 2.1.02.14 [Index Number 66]

#### 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 2.1.02.14 [Index Number 66] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.1.02.14 [Index Number 66]. 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,

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 2.1.02.14 [Index Number 66]

MJY/DWM/amw

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### Southern Nuclear Operating Company ND-17-1132 Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Completion Plan for Uncompleted ITAAC 2.1.02.14 [Index Number 66]

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#### **ITAAC Statement**

#### **Design Commitment**

14. Controls exist in the MCR to cause the components identified in Table 2.1.2-3 to perform the listed function.

#### Inspections/Tests/Analyses

Testing will be performed on the components in Table 2.1.2-3 using controls in the MCR.

#### Acceptance Criteria

Controls in the MCR operate to cause the components listed in Table 2.1.2-3 to perform the listed functions.

### **ITAAC Completion Description**

Testing is performed in accordance with Unit 3 and Unit 4 preoperational test procedures SV3-RCS-T1P-502 and SV4-RCS-T1P-502 (References 1 and 2, respectively) to verify that controls exist in the Main Control Room (MCR) to cause components identified in Combined License (COL) Appendix C Table 2.1.2-3 (Attachment A) to perform the listed function. Testing is performed using controls in the MCR to cause the components listed in Attachment A to perform the listed functions.

References 1 and 2 confirm that each pressurizer heater turns on and off when the MCR controls are manipulated. The individual heater groups for each bank of heaters is tested to verify proper operation utilizing the Plant Control System (PLS) and testing is coordinated with pressurizer heater component testing. The pressurizer heater contactors are verified to close and open contacts locally based on PLS demands from the MCR.

The reports documenting the Unit 3 and Unit 4 preoperational test results, SV3-RCS-T2R-502 and SV4-RCS-T2R-502 (References 3 and 4, respectively), confirm that controls in the MCR operate to cause the components listed in Attachment A to perform the listed functions.

References 1, 2, 3 and 4 are available for NRC inspection as part of the ITAAC 2.1.02.14 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-RCS-T1P-502, "Reactor Coolant System Preoperational Test Procedure"
- 2. SV4-RCS-T1P-502, "Reactor Coolant System Preoperational Test Procedure"
- 3. SV3-RCS-T2R-502, "Reactor Coolant System Preoperational Test Results Report"
- 4. SV4-RCS-T2R-502, "Reactor Coolant System Preoperational Test Results Report"
- 5. ITAAC 2.1.02.14 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 2.1.2-3**

Equipment	Tag No.	Display	Control Function
Pressurizer Heaters	RCS-EH-03	Yes	On/Off
Pressurizer Heaters	RCS-EH-04A	Yes	On/Off
Pressurizer Heaters	RCS-EH-04B	Yes	On/Off
Pressurizer Heaters	RCS-EH-04C	Yes	On/Off
Pressurizer Heaters	RCS-EH-04D	Yes	On/Off