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52-026

ND-17-1139  
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 2.5.01.02c.ii [Index Number 509]

Ladies and Gentlemen:

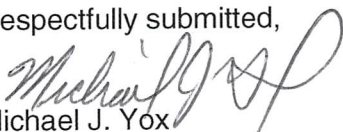
Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of June 21, 2017, Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.5.01.02c.ii [Index Number 509] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing ITAAC 2.5.01.02c.ii [Index Number 509]. 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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U.S. Nuclear Regulatory Commission

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Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.5.01.02c.ii [Index Number 509]

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**Southern Nuclear Operating Company  
ND-17-1139  
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3 and Unit 4  
Completion Plan for Uncompleted ITAAC 2.5.01.02c.ii [Index Number 509]**

## **ITAAC Statement**

### **Design Commitment**

2.c) The DAS provides manual initiation of reactor trip, and selected functions, as identified in Table 2.5.1-2, separate from the PMS. These manual initiation functions are implemented in a manner that bypasses the control room multiplexers, if any; the PMS cabinets; and the signal processing equipment of the DAS.

### **Inspections/Tests/Analyses**

Electrical power to the control room multiplexers, if any, and PMS equipment will be disconnected and the outputs from the DAS signal processing equipment will be disabled. While in this configuration, an operational test of the as-built system will be performed using the DAS manual actuation controls.

### **Acceptance Criteria**

ii) DAS output signals are generated for the selected functions, as identified in Table 2.5.1-2, after manual initiation controls are actuated.

## **ITAAC Completion Description**

Multiple ITAAC are performed to verify that the Diverse Actuation System (DAS) provides manual initiation of reactor trip, and selected functions, as identified in Combined License (COL) Appendix C Table 2.5.1-2 (Attachment A), separate from the Protection and Safety Monitoring System (PMS). The subject ITAAC verifies that the selected functions, other than manual reactor and turbine trip, are initiated after a manual actuation is performed.

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 the as built DAS provides manual initiation of selected functions separate from the PMS. The test procedure de-energizes the PMS cabinet power supplies (no multiplexer exists) and blocks DAS automatic input signals and prevents DAS automatic output actuation by placing DAS in Master Test. Initial conditions are verified and testing is performed by manually actuating the DAS manual functions identified in Attachment A. During the manual functions testing, the DAS output signal is verified for each selected function by relay contact inspection in the DAS cabinets.

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 the DAS output signals are generated for the selected functions after manual initiation controls are actuated.

References 1, 2, 3 and 4 are available for NRC inspection as part of the ITAAC 2.5.01.02c.ii Completion Packages (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 2.5.01.02c.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 2.5.1-2**

<b>Table 2.5.1-2 Functions Manually Actuated by the DAS</b>
<ul style="list-style-type: none"><li>2. PRHR Actuation and IRWST Gutter Isolation</li><li>3. CMT Actuation and Trip All Reactor Coolant Pumps</li><li>4. First-stage Automatic Depressurization System (ADS) Valve Actuation</li><li>5. Second-stage ADS Valve Actuation</li><li>6. Third-stage ADS Valve Actuation</li><li>7. Fourth-stage ADS Valve Actuation</li><li>8. PCS Actuation</li><li>9. Isolation of Selected Containment Penetrations</li><li>10. Containment Hydrogen Igniter Actuation</li><li>11. IRWST Injection Actuation</li><li>12. Containment Recirculation Actuation</li><li>13. Actuate IRWST Drain to Containment</li></ul>